

**BEFORE THE
NATURAL RESOURCES COMMISSION
OF THE
STATE OF INDIANA**

IN THE MATTER OF:

RULE AMENDMENTS TO ESTABLISH A)	Administrative Cause
TRAPPING SEASON FOR RIVER OTTERS, TO)	Number 14-054D
ALLOW THE SALE OF HIDES FROM SQUIRRELS)	(LSA Document #14-341(F))
AND RIVER OTTERS, AND MAKE NECESSARY)	
CONTEMPORANEOUS ALTERATIONS)	

**REPORT ON RULE PROCESSING, CONSIDERATION OF PUBLIC COMMENTS,
ANALYSIS AND RECOMMENDATION REGARDING FINAL ADOPTION**

1. RULE PROCESSING

Principally for consideration is a proposal to amend 312 IAC 9-3-18.2 to establish a trapping season for river otters and to amend 312 IAC 9-2-3 to allow for the sale of hides from legally taken river otters and squirrels. The proposal also includes contemporaneous amendments to 312 IAC 9-3-18.4 and to 312 IAC 9-10-12, which are made necessary by the amendment of 312 IAC 9-3-18.2.

The amendments related to the sale of squirrel hides resulted from a citizen's petition for rule changes filed with the Natural Resources Commission ("*Commission*") by Wayne Langman on October 5, 2012. Upon consideration by a committee established by the Department of Natural Resources ("*Department*") and as part of the Division of Fish and Wildlife's ("*DFW*") biennial review under the Nonrule Policy Document established by the Commission as Information Bulletin #7 (Third Amendment), *Petitions for Rule Change and for Nonrule Policy Document Change*, posted at <http://www.in.gov/legislative/iac/20111005-IR-312110580NRA.xml.pdf>, it was concluded that the sale of squirrel hides "allows for the utilization of a resource that is harvested without harm to the wild population." *FW: Squirrel Hides, Administrative Cause No. 14-177D*.

The DFW reported at the time the Commission granted preliminary adoption in July 2014, that the establishment of a trapping season for river otters was appropriate and the season established

“would allow an individual to take no more than two river otters from designated counties in Indiana from November 15 through March 15. The counties and the statewide quota would be set by temporary rule each year and would open the season in 64 counties with a first year quota of 600 state-wide.”

Executive Order 13-03 requires agencies to “suspend rulemaking action on any proposed rules for which a notice of intent to adopt a rule...was not submitted to the office of the Indiana *Register* on or before January 14, 2013.” Additional compliance provisions were included in Financial Management Circular 2013-01. Joseph Hoage, General Counsel for the Department submitted to the Office of Management and Budget (“OMB”) a request for an exception to the suspension of rulemaking action under the provisions of Executive Order 13-03 on April 14, 2014. In a letter dated May 16, 2014, Christopher D. Atkins, Director, OMB, wrote that the Department’s “request qualifies for an exception under Section 6(b) of Executive Order 13-03. Therefore, DNR may proceed with the rule as proposed in its April 14, 2014 submission.”

The proposed rule was granted preliminary adoption by the Commission on July 15, 2014.

The “Notice of Intent” to adopt the proposed rule amendment was posted to the INDIANA REGISTER database website as 20140827-IR-312140341NIA on August 27, 2014. The notice identified Linnea Petercheff, Staff Specialist with the DFW, as the “small business regulatory coordinator” for purposes of Indiana Code § 4-22-2-28.1.

The Commission caused the information required by I.C. 4-22-2-22.5 to be included within the rulemaking docket maintained on its Internet website. The rulemaking docket has been updated throughout the rule adoption process.

Following the posting of the Notice of Intent, fiscal analyses of the rule proposal were submitted, along with a copy of the proposed rule language and a copy of the posted Notice of Intent, to the Office of Management and Budget on September 9, 2014 as specified by Executive Order 2-89 and Financial Management Circular 2010-4. The material was also submitted to George Angelone, Counsel for the Legislative Council, on September 9, 2014. In a letter dated October

23, 2014, Brian E. Bailey, Director, Office of Management and Budget, recommended that the proposed rule amendments be approved.

The Commission's Division of Hearings submitted the rule proposal to the Legislative Services Agency ("LSA") along with the "Statement Concerning Rules Affecting Small Business" (also known as the "Economic Impact Statement") on October 30, 2014. The Notice of Public Hearing was submitted to LSA on November 5, 2014. The Notice of Public Hearing was posted to the INDIANA REGISTER database website on November 12, 2014 as 20141112-IR-312140341PHA along with the Economic Impact Statement (20141112-IR-312140341EIA) and the text of the proposed rule (20141112-IR-312140341PRA). Following receipt of an "Authorization to Proceed" from LSA on November 5, 2014, the NRC Division of Hearings also caused a Notice of Public Hearing to be published by the Indianapolis Newspapers, which publishes a newspaper of general circulation in Marion County, Indiana, on November 12, 2014. In addition, notice of the public hearing and a summary of the proposed rule changes were published on the Commission's web-based electronic calendar.

As required by I.C. 4-22-2.1-5(c)(2), the proposed rule amendments and Economic Impact Statement were also submitted to the Office of Small Business and Entrepreneurship ("OSBE") on November 5, 2014. In a letter dated November 6, 2014, Erik Scheub, Small Business Ombudsman, stated that "OSBE does not object to the economic impact to small business associated with the proposed rule."

2. REPORT OF PUBLIC HEARING AND COMMENTS

a) Public Hearing Comments

A public hearing was conducted at the Plainfield Public Library in Plainfield, Indiana on December 11, 2014, as scheduled. Sandra Jensen served as the hearing officer. The DFW was represented by Division Director Mark Reiter; Staff Specialist Linnea Petercheff; Chief of Wildlife Mitch Marcus; Private Lands Program Coordinator Gary Langell; and Furbearer Management Biologist Shawn Rossler. The Department's Division of Law Enforcement was present by Lt. Colonel Steve Hunter and Major Terry Hindman.

The sign-in sheets provided for members of the public indicate that approximately 47 individuals were in attendance. A summary of the oral comments received at the public hearing has been attached and incorporated by reference at Exhibit A. Certain individuals attending the public hearing also provided written comments, which have been reproduced, attached and incorporated by reference at Exhibit A1.

b) Comments Received Outside Public Hearing

An opportunity was provided for members of the public to submit written comments from approximately August 29, 2014 until the comment period closed at midnight on December 11, 2014. Written comments were received through the Commission's online comment form. These comments have been reproduced, attached and incorporated by reference at Exhibit B.

c) Response by the Department of Natural Resources

On December 22, 2014, the DFW submitted its response to the public comments received. Contained within the response is the request for three revisions to the rule language as posted by LSA. Following consultation with the hearing officer, the DFW submitted a revised response on January 13, 2014. The DFW's revised response has been reproduced, attached and incorporated by reference at Exhibit C.

3. ANALYSIS AND RECOMMENDATION

The portion of the proposal receiving the greatest public attention and comment is the establishment of a trapping season for river otters extending from 8:00 a.m. on November 15 through noon on March 15 of the following year through the amendment of 312 IAC 9-3-18.2. Amendments to 312 IAC 9-2-3 would authorize the sale of squirrel hides in response to a citizen's petition for rule change and would also authorize the sale of "any portion of a river otter" in anticipation that the proposed amendment to 312 IAC 9-3-18.2 will be approved. The establishment of a trapping season for river otters would also necessitate contemporaneous amendments to 312 IAC 9-3-18.4, which presently prohibits the sale and possession of any portion of a river otter, and 312 IAC 9-10-12 relating to fur buyers' licenses.

Whether supporting or opposing the proposed establishment of the river otter trapping season, it is generally acknowledged by individuals offering comments that river otters were once extinct, or nearly extinct, in the State of Indiana and required reintroduction into the state's ecosystem.

Those opposed to establishing the trapping season note that river otter populations vary greatly throughout the State with populations in central Indiana remaining extremely scarce. Many of these individuals seek to have the DFW embark upon a process of relocating river otters from areas of the State where populations are thriving to areas of the state where populations remain limited. Many of these individuals also question whether sufficient data exists to support the conclusion that populations of river otters within the areas where trapping will be authorized are adequate. These commenters express concern that trapping will, once again, be allowed to render river otters extinct or nearly so.

Conversely, individuals who support the establishment of the season clearly favor the Department's proposed approach, which allows the trapping of river otters from within geographical areas of the State where there exist sustainable populations of river otters. Many of these individuals, who are predominantly trappers, recalled their own personal and organizational involvement in, as well as their financial contribution to, the reintroduction of the river otters that facilitated the re-establishment of the species. Other comments by individuals who favor the establishment of the river otter trapping season cite nuisance type damage being caused by river otters and the accidental trapping of river otters while attempting to trap other species as evidence of the population in certain areas.

The information gathered through the rulemaking process does not include any actual population data produced by the DFW. However, anecdotal evidence provides a reasonable basis to conclude that the populations of river otters are widely varied with some populations being of great enough numbers to result in the report of nuisance damage to ponds, stocked fish resources and commercial fisheries. Certain comments indicate that in these areas river otters have been hit by cars on the roadway and are trapped by accident while lawfully attempting to trap other species. It was also reported in comments that the nuisance damage is becoming so great that landowners are presently killing river otters illegally and simply throwing them away.

The DFW has reported that the reintroduction locations of the river otters occurred in areas having the most appropriate habitat. These are the areas having greater populations sufficient to sustain the proposed harvest. Areas in central Indiana contain less optimal habitat and are areas where river otters were not directly reintroduced. Consequently, central Indiana areas do not presently have extensive populations. For this reason the DFW has concluded that the 26 counties in central Indiana will not be opened for trapping. The DFW offered the following in its response to public comments:

The counties open to harvest are in watersheds where river otter were originally relocated, have had time to establish, and where populations are doing well. The 26 counties in central Indiana that would remain closed are within watersheds where river otters were not reintroduced and have not become established. A feasibility study complete in 1994 suggests that river otter habitat is less optimal within these closed counties/watersheds.

The Department's conclusion that through the establishment of this trapping season, which allows the harvest of modest numbers of river otters from only those areas where populations are thriving will "ensure otters continue to thrive in Indiana while allowing sustainable harvest in areas of the state where they are doing very well. The conservative bag limit and statewide quota are designed to allow otters the opportunity to continue to expand their range and population densities in central Indiana."

Certain comments express distaste for trapping and for this reason, alone, seek to have the Commission reject the establishment of the trapping season for river otters. Trapping is a legal means of taking certain wild animals and is, in the case of certain species including the river otter, the most effective means of harvest.

Overall, the information available suggests that the establishment of a trapping season for river otters within limited geographical areas is appropriate. The establishment of such a season will allow for a regulated harvest for proper management of the species. Such action will provide additional opportunities for trappers while simultaneously providing for the management of the river otter populations.

The DFW has requested that three revisions be made to the proposed rule as published in the Indiana Register. One of the requested revisions relates to 312 IAC 9-3-18.2 and two relate to 312 IAC 9-10-12. The suggested revisions to 312 IAC 9-10-12 are supported by a written comment, whereas the suggested revision to 312 IAC 9-3-18.2 is not. Each of these suggested revisions will be addressed separately.

Revisions to rule language following publication in the INDIANA REGISTER is governed by Indiana Code § 4-22-2-29, which, in relevant part, states:

Sec. 29. (a) After an agency has complied with sections 26, 27, and 28 of this chapter, the agency may:

(1) adopt a rule that is identical to a proposed rule published in the Indiana Register under section 24 of this chapter;

...

(4) subject to subsection (b), adopt a revised version of a proposed rule published under section 24 of this chapter and include provisions that did not appear in the published version, including any provisions recommended by the Indiana economic development corporation under IC 4-22-2.1-6(a), if applicable.

(b) *An agency may not adopt a rule that substantially differs from the version or versions of the proposed rule or rules published in the Indiana Register under section 24 of this chapter, unless it is a logical outgrowth of any proposed rule as supported by any written comments submitted:*

(1) during the public comment period; or

(2) by the Indiana economic development corporation under IC 4-22-2.1-6(a), if applicable.

As added by P.L.31-1985, SEC.18. Amended by P.L.12-1993, SEC.2; P.L.188-2005, SEC.3.

Emphasis added.

The revision to 312 IAC 9-3-18.2 involves combining the requirements set forth in subdivision

(1) and subdivision (2) in subsection (h). Subsection (h), as published by LSA, reads as follows:

(h) An individual who takes a river otter during the trapping season must retain possession of the river otter and cause delivery of the skinned hide and carcass, including the head, of the river otter to a designated department employee or official river otter checking station within fifteen (15) days after the month of harvest. The department employee must:

- (1) issue a tag as required by the Convention on International Trade in Endangered Species of Wild Flora and Fauna for each hide;**
- (2) attach it to the hide in accordance with 50 CFR 23.69; and**
- (3) maintain possession of the skinned river otter carcass (not the hide).**

As applicable to river otters 50 CFR 23.69 specifies that:

(c) *CITES tags*. Unless an alternative method has been approved, each CITES fur skin to be exported or re-exported must have a U.S. CITES tag permanently attached.

(1) The tag must be inserted through the skin and permanently locked in place using the locking mechanism of the tag.

(2) The legend on the CITES tag must include the US-CITES logo, an abbreviation for the State or Tribe of harvest, a standard species code assigned by the Management Authority, and a unique serial number.

It is noted that reference to “CITES” in 50 CFR 23.69 refers to the “Convention on International Trade” as referenced in 312 IAC 9-3-18.2(h)(1), as published. Because 50 CFR 23.69 addresses both the issuance of “a tag as required by the Convention on International Trade in Endangered Species of Wild Flora and Fauna”, which is addressed in the present subdivision (1), and also addresses the requirements to attach the tag to the hide, the DFW concluded that combining subdivision (1) and subdivision (2) offered greater clarity without altering the intent or the requirements of the rule language as published by LSA.

With this revision, subsection (h) would read:

(h) An individual who takes a river otter during the trapping season must retain possession of the river otter and cause delivery of the skinned hide and carcass, including the head, of the river otter to a designated department employee or official river otter checking station within fifteen (15) days after the month of harvest. The department employee must:

- (1) issue a tag and attach it to each hide in accordance with 50 CFR 23.69;**
- and**
- (2) maintain possession of the skinned river otter carcass (not the hide).**

Although the hearing officer cannot be certain that the Office of the Attorney General will concur, it is the opinion of the hearing officer that this revision does not create a rule that substantially differs from the rule published by LSA.

The two revisions to the rule language for 312 IAC 9-10-12 as sought by the Department involve the complete removal of subsection (i) and a revision of subsection (e) to differentiate the means

by which a fur buyer is required to document the date and method of lawful acquisition for bobcats and badgers from the manner of recording the date and method of lawful acquisition of all other species of wild animals. These revisions are both supported by the written comment made on December 9, 2014 by Todd Lang, of LaGrange County, Indiana.¹

With respect to the revision to subsection (e) the DFW offers in its response:

The intent of the proposed change was to require fur buyers to record the date and method of lawful acquisition for each hide or carcass that is purchased, and only to require documentation for bobcats and badgers since there is no open season for them in Indiana (there is in some other states). The rule would be revised as follows:

(e) A licensed fur buyer must do the following:

(1) Not possess the carcass or untanned hide or any part of a bobcat, ~~river otter~~, or badger unless the carcass, untanned hide, or part was lawfully acquired outside Indiana.

(2) Document **the date and method of** lawful acquisition of each untanned hide or carcass **of a bobcat and badger** by obtaining from the seller a legible copy of any:

- (A) tag;
- (B) receipt;
- (C) hunting license;
- (D) trapping license;
- (E) permit; or
- (F) other appropriate record;

from the state or country where the animal, including any part or portion of the animal, was acquired.

(3) Record the date and method of lawful acquisition of each untanned hide or carcass of a wild animal other than a bobcat and badger.

See Exhibit C.

With respect to the elimination of subsection (i), the DFW stated that few issues have arisen with respect to the disposal of carcasses by holders of fur buyers licenses and there are other means by which potential complaints can be addressed. The DFW stated that it “does not believe that these changes are needed at this time.”

¹ Exhibit B, pg. 68.

The hearing officer is of the opinion that the revisions requested with respect to subsection (e) and the elimination of subsection (i) of 312 IAC 9-10-12, while possibly creating a rule that differs in a limited manner from the rule language as published by LSA, are a logical outgrowth of the proposed rule and are supported by a written comment. Recognizing that the Indiana Attorney General may have a differing opinion, it is the hearing officer's conclusion that the revisions to 312 IAC 9-10-12, as proposed by the DFW, fully comply with I.C. 4-22-2-29 and may be approved as requested.

The hearing officer presents the rule proposal with the revision to 312 IAC 9-3-18.2(h) and 312 IAC 9-10-12(e) as well as the elimination of 312 IAC 9-10-12(i) for final adoption. The rule language included at Exhibit D, which is attached and incorporated by reference, is the rule language as published by the Indiana Register, with the noted revisions incorporated.

Dated: January 13, 2014

Sandra L. Jensen
Hearing Officer

EXHIBIT A**SUMMARY OF ORAL COMMENTS RECEIVED DURING THE PUBLIC HEARING
CONDUCTED ON DECEMBER 11, 2014:****Charlie Masheck, Shelby County, Indiana**

Masheck fully supported the rule proposal stating that he believes it is “awesome” to have a population of river otters to sustain a harvest. Masheck added that the animals are treated as humanely as possible by trappers and urged the decision on the proposal to be made based on science and not emotion.

Erin Huang, Marion County, Indiana

Huang serves as the Indiana Director of the Humane Society of the United States and directed the Commission to her written comment for additional detail. Huang noted that river otters were extirpated from Indiana in 1942 and at present their populations range from “rare to abundant” throughout Indiana. She observed that river otters are not known to be present in all Indiana counties at this time. Huang reminded that wildlife is held by the Department in public trust for the benefit of all citizens, noting that trapping causes unavoidable suffering and distress to wild animals, which is unacceptable to much of the general public. Huang urged the Commission to consider the concerns and interests of the general public in making its determination. Huang further noted the lack of data upon which the proposed rule is based and observed that the rule allows significant flexibility in the number of river otters that will be harvested annually stating that the rule is not consistent with a true management plan which would establish an empirical baseline from which both the river otter population and ecological impact of that population would be documented. Huang offered opposition to the rule proposal.

Katherine Hostetter, Hendricks County, Indiana

Hostetter supported the comments of Erin Huang. Hostetter added the opinion that river otters in geographical areas experiencing damage from increased populations should be trapped and relocated to areas of the state where river otter numbers have not reached numbers sufficient to sustain a harvest. Hostetter stated that it is a sign of a civilized society how the people treat animals.

Jane Oyler, Hendricks County, Indiana

Oyler offered the opinion that death is not an alternative suggesting, instead, that before allowing localized harvests a redistribution of river otters from areas where they are overabundant to areas where they remain scarce should be made. Oyler also suggested that river otters could be relocated to other states where they are not so abundant. She added that to her knowledge river otter meat is not used for anything observing that it’s simply wasted; while deer is at least used as food.

Henry Mang, Hendricks County, Indiana

Mang offered support for the rule stating that if appropriate populations exist trapping should be allowed.

Tom Geisler, White County, Indiana

Geisler reported being a member of the Indiana State Trappers Association who recalled the reintroduction of river otters into Indiana. He offered that damage caused by river otters is occurring in White, Carroll, Cass, Pulaski and Tippecanoe Counties as well as an observed decrease in fish populations. He added his belief that there are “trap-able populations” stating his full support for the proposed rule.

Tom Setser, Hendricks County, Indiana

Setser stated that he is a fur trapper who is in full support of the rule proposal.

Jesse Melton, Hancock County, Indiana

Melton stated that since the Department of Natural Resources has established that there are populations of river otters that will sustain the limited harvest proposed by the rule, the rule should be supported. Melton added that currently Kentucky has a season limit of 10 river otters and the Illinois season limit it five.

Dennis Cobb, Madison County, Indiana

Cobb expressed favor for the adoption of the proposed rule. He noted that he is aware of damage to fish populations in private ponds and being in the industry he reported frequently seeing river otters.

Ron Frazier, Hendricks County, Indiana

Frazier acknowledged that he cannot speak to the issue directly but expressed the belief that if the populations are sufficient the opportunity for trapping should be allowed.

Eric Lange, Hamilton County, Indiana

Lange stated opposition for the proposed rule noting that at one time river otters were extinct in Indiana. He observed that a taking season should not be established until the populations are restored throughout the state. Lange offered the belief that a river otter cannot be blamed for going to a stocked pond as it is the nature of any wild animal to go where “easy food” is available.

Dennis Lange, Hamilton County, Indiana

Lange contested the statements that there are populations of river otters sufficient to sustain a trapping season. He noted that he lives along the White River and has only seen one river otter. Lange also observed that his family owns property along the Wabash River below Lafayette in Tippecanoe County and he has not seen any river otters at that location. In reaction to a previous comment, Lange acknowledged that river otters may be above Lafayette but reiterated that there are none below Lafayette. Lange added that he would like to see more quantifiable support for the numbers the Department believes are present.

Greg Griffin, Shelby County, Indiana

Griffin advised that the North American River Otter is an indicator of the health of an ecosystem and offered opposition to the proposed rule. He contested the position of the Indiana State Trappers Association that the population will go unchecked such that river otters will become a nuisance species. Griffin added the belief that greed is driving the rule proposal expressing the opinion that trappers want the \$80.00 per pelt and are lobbying hard to see that the rule is

adopted. Griffin observed that he recently visited Goose Pond and Muscatatuck and didn't see a single river otter, adding further that many counties in central Indiana still do not have any river otters. Griffin added that the naturalist at Goose Pond confirmed that there are no river otters; only muskrat. Griffin supported the idea of relocating river otters to redistribute populations throughout Indiana. Griffin also suggested that river otters are a natural predator to Asian Carp suggesting that they could be used to eradicate the invasive fish that has infiltrated Indiana's waterways. Griffin offered the belief that the populations stated by the Department are misrepresentations noting that wildlife are held in trust by the Department of Natural Resources for the benefit of the public, not only for the trappers.

Mark Thompson, Hendricks County, Indiana

Thompson stated that he is not a trapper but the issue and the comments are of interest. Thompson observed that deer populations and turkey populations were once not sufficient to sustain harvests but noted the dramatic rebound made by both of these species. He added his belief that it is the interest of hunters, trappers and anglers in conservation and the financial support the state obtains from hunting and trapping licenses that make this possible. Thompson stated that he saw four river otters at Muscatatuck recently while deer hunting.

John Wahl, Morgan County, Indiana

Wahl stated that around the room he saw many faces of people who worked with him to bring river otters back to Indiana. Wahl offered the opinion that if a sustainable population exists in a county a taking season should be established. He added that the DNR hires biologists trained to make these recommendations and suggested that the professionals be allowed to do their jobs.

David Britt, Marion County, Indiana

Britt stated that he is an avid canoer and kayaker and has observed river otters while on the Big Walnut, in Shades State Park and at many other places. Britt added that to see river otters a person has to be where they are; where they live. He offered support for the proposed rule.

Gail Griffin, Shelby County, Indiana

Griffin stated opposition for the proposed rule for the reason that trapping is cruel. She offered that the river otters in overpopulated geographical areas should be trapped live and relocated to areas where they remain scarce.

Angela Gioe, Morgan County, Indiana

Gioe offered opposition to the proposed rule and support for the position taken by Erin Huang. Gioe added that while she is not opposed to hunting she stated her belief that trapping is cruel noting her belief that there should be other options. Gioe questioned why river otters from overpopulated areas are not being relocated to areas with scarce populations.

John Schulz, Hendricks County, Indiana

Schulz opposed the proposed rule noting that documentation confirming the population of river otters has not been produced. He observed that the discussion has focused on river otters being a nuisance in terms of taking fish from privately stocked ponds and he questioned how it had been documented that river otters were responsible for the damage.

Kevin Gore, Muhlenburg, Kentucky

Gore stated that he is lucky to live in a state that has allowed the trapping of river otters for 10 years. He explained that river otters were extinct in Kentucky at one time too but were reintroduced there in or near 1985 to 1986 and by 2003 to 2004 Kentucky had established a trapping season. Within five years the population had doubled and the health of the river otters is now “better than ever”. Gore offered the opinion that people should listen to the DNR.

Don Kolley, Warrick County, Indiana

Kolley offered that the populations of river otter are good and in places there are “way too many.” Kolley added that river otters are “killing machines” that are wiping ponds out. He offered that the signs of river otters are apparent if a person knows what to look for. Kolley explained that “spit up piles” of fish scales are indicators that river otters are present even if the animal is not seen. He noted that he has seen river otters at Goose Pond even if others report that there are none there. Kolley also noted that he is a member of the Furtakers of America Chapter C, comprised of 60 members, who donated \$500.00 to the effort to reintroduce river otters in Indiana with a release that occurred at Sugar Creek.

Nick Erny, Dubois County, Indiana

Erny stated that a person will not see a river otter unless they stay in one place and watch for a while noting that they have a large home range. Erny observed that trappers and hunters are not just “a bunch of guys who want to kill stuff.”

Scott Silke, Warrick County, Indiana

Silke stated strong support for trapping. Silke noting that trapping seasons for river otters exist in all states that surround Indiana so the idea of relocating river otters to other states did not appear to be a viable alternative. He noted that trappers do not want animal populations decimated, adding that hunting, trapping and fishing license fees typically pay for the reintroduction of species. Silke observed that even raccoons once had to be reintroduced and now raccoons are considered a nuisance by many people. Silke observed further that overpopulation of animals within an area results in the animals suffering while controlling the populations through hunting and trapping aid in maintaining proper balances for the benefit of the area ecosystem.

Bill Geisler, White County, Indiana

Geisler expressed favor for the proposed rule and season. He questioned how long it has been since anyone in the room had seen a weasel noting that just because you do not see them does not mean they are not there.

Dr. Fred Phillips, Rush County, Indiana

Phillips explained that he is a veterinarian and is also the President of the Indiana State Trappers Association (ISTA). Phillips explained that ISTA worked very hard to accomplish the reintroduction of river otters into Indiana. According to Phillips reintroduction efforts in Illinois, Iowa and Indiana have generated good results and increasing river otter populations. Phillips noted that in light of the effort involved in trapping a river otter a trapper would be lucky to recoup his gas money by selling a pelt for \$80.00 so the desire for the establishment of the season as proposed is not about greed. Phillips expressed agreement with other commenters

regarding a vehement opposition to any type of poaching. However, expressed the opinion that a lawful season allowing a limited hunt should be allowed in areas where populations of river otters are at appropriate levels. Phillips added that people should let the DNR staff do what they are paid to do.

Gail Moon, Hamilton County, Indiana

Moon offered opposition to the proposed rule and expressed the opinion that trapping is “barbaric”. Moon noted that trapping causes extreme pain and presents a horrendous way for an animal to die. She questioned why trappers would make the effort to reintroduce river otters only to kill them.

Thomas J. McKeon, Marion County, Indiana

McKeon stated the opinion that there is no need for a trapping season and no need to consider alternatives because the data regarding river otter populations is manufactured and based on nothing scientific. McKeon added that river otters are not killing endangered species; they are merely killing fish in commercial fish ponds that the owner should take responsibility for protecting. He added the opinion that protecting private commercial fish ponds is a “ridiculous” reason to establish a trapping season for river otters. McKeon observed that river otters were trapped to extinction before and offered that the “playful, precocious and intelligent” animals should be protected instead of allowing that to happen again.

Laryn Peterson, Marion County, Indiana

Peterson offered the opinion that trapping is inhumane and questioned what a person should do if a dog gets into a trap. With respect to individuals protecting their private stocked ponds, Peterson observed that there are nuisance permits that a landowner can get to address that problem.

Mark Mallatt, Newton County, Indiana

Mallatt explained that he used to hunt Pheasant but stopped all hunting activities 36 years ago. Despite the fact that he no longer hunts Mallatt expressed understanding for the need to regulate wildlife populations. He acknowledged a personal interest in controlling the river otter populations noting that he recently spent \$10,000 re-engineering a pond near Kentland, Indiana and stocking it with 200 hybrid Bluegill at a cost of \$0.75 each only to have river otters wipe all the fish out. Mallatt added that six of his neighbors have had similar experiences. Mallatt offered the opinion that limited harvests of river otters on a county by county basis determined by population is appropriate to avoid having the populations rise to a situation similar to what Indiana experiences with deer. Mallatt added that nuisance river otters are being shot anyway but are presently being thrown away suggesting that conducting a limited harvest in a regulated way would allow the animals to be used for something instead of being wasted.

EXHIBIT A1

**WRITTEN COMMENTS RECEIVED DURING THE PUBLIC HEARING
CONDUCTED ON DECEMBER 11, 2014:**

MARK E. MALLATT, D.D.S., M.S.D.

1753 ESTHER CT.
PLAINFIELD, IN 46168
PH. (317) 839-2862
CELL (317) 997-1745

The attached e-mails were sent
to me by concerned land owners in
Newton County with regard to river otters.

I indicated that I would be present at
the scheduled DNR meeting at the Plainfield
public library December 11, 2014.

Mark E. Mallatt
12/11/14

Ross Mallatt
740 W 600 S
Lebanon IN 46052
317-850-2109

December 10, 2014

TO: Indiana DNR

RE: River Otters

Gentlemen,

Reintroducing river otters to our state was a bad idea. If they no longer live here on their own accord, so there must be a reason. It is not the natural balance of things. Otherwise nature would have made it that way. We now have flying carp in the Wabash, an over population of Starlings and Japanese beetles and invasive species of several types in the Great Lakes, all thanks to man, whether intentional or not.

Why river otters? Why not reintroduce grizzly bears and moose? Because it doesn't make sense.

As a landowner of 150 acres in northwest Indiana, my farm pond has been completely wiped out by river otters. I put consider time and money into stocking my pond for recreational and food purposes, all for naught. I know of at least 5 neighbors who have had the same thing happen.

But the damage is done, so now what? I propose you let landowners trap or shoot these critters if they are causing damage to our ponds. Period.

Thank you.

Ross Mallatt

(1557 unread) - mmallatt - Yahoo Mail

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River Otter Damage(6) **People**

JonIartiedark Dec 9 at 10:18 PM
To: me

This is to state my concerns of the River Otters eating the fish that are in my ponds.

I have 3 stocked ponds on private property that my whole family enjoys fishing in. I have purchased many different varieties of fish over the years to maintain healthy ponds. I have seen River Otters in these ponds and have lost numerous fish due to them now being in the area. This has caused me money, time, and pleasure and believe they are a nuisance.

Something needs to be done to control these fish eating otters.

Concerned Landowner,

Arthur D Clark
10562 S 500 W
Kentland, IN 47951
219.863.7371

Read from my Verizon Wireless 4G LTE security device

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me got it Art--thanks Dec 9 at 11:13 PM

JonIartiedark Is this good/what u wanted? Art Sent from my Verizon Dec 9 at 11:22 PM

me On Tuesday, December 9, 2014 11:23 PM, JonIartiedark <JonIart> Dec 9 at 11:23 PM

To: Ross Mallatt CC

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Tt B I

me Dec 10 at 5:07 PM
To: Ross Mallatt, Randy Hall
FYI

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by MADDOG PHOTOGRAPHY on Flickr

https://us-mg5.mail.yahoo.com/neo/launch?.rand=f8cnhetg9q03n

12/11/2014

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3. Toy trucks
4. Chanel perfume
5. Christmas gift boxes
6. Hot chocolate gifts
7. Samsung Galaxy No...
8. Lego Architecture ex...
9. Leather purses
10. Arc'teryx jacket

BARBARA WILFONG
To: me Today at 8:01 AM

From: barbwilfong@hotmail.com
To: mmallatt@yahoo.com
Subject: Otters
Date: Wed, 10 Dec 2014 22:47:17 -0600

To Whom It May Concern:

My husband and I are land owners in Newton County, IN and we have a small pond. We have realized for quite a few years that we have had a diminishing crop of fish in our pond. We have replenished it several times, and at this point we are not considering doing it again. We feel that the otters may be invading the pond and causing the loss of fish in our pond.

We ask for protection to land owners to take care of the problem of the otters who are wiping out the fish crops.

Barbara Wilfong *Kentland, IN NEUTON CO. IN*

Reply, Reply All or Forward | More

To CC

Got it--thanks Barbara!

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The Digital Di Check this out! Action needed: This could be one of the mQ 10:37 AM
Six Month Co. Performance the Learning Outcomes System for GDE 731 9:49 AM
river otter(4) People

Randy Hall
To: MMALLATT@yahoo.com
Dec 9 at 10:09 PM

DNR
As a land owner w/pond at 4009w 1260s Kentland, IN, I would like to see rules put in place to control river otters. My wife and I have purchased many fish to make our pond reach quality levels for all ages. This summer 2014, 3 otters came in and destroyed our pond. Please consider rules and regulations changes to protect pond owners like ourselves.
Thanks
Randy & Becky Hall

Reply, Reply All or Forward | More

me got it Randy--thanks
Dec 9 at 11:13 PM

me I'm rallying the troops!
Dec 9 at 11:22 PM

me
To: jonlar@clark, Ross Mallatt
Dec 10 at 5:08 PM

FYI

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Sponsored

Amex Everyday® Preferred
Earn 15,000 Points & 3X Points at US Supermarkets. Learn...

☐ me river otters (2) DNR officials: In 1995 303 river otters from La 11:30 AM

☐ • me otters (2) This is a test 10:57 AM

☐ • The Digital Di Check this out! Action needed: This could be one of the mQ 10:37 AM

☐ • Six Month So Embrace the Tradition: Otters Custom for Gile (2) Founder 9:48 AM

River Otter(2) [People](#)

Rick/Dab Dec 10 at 10:22 PM
To: me

To Whom it may concern,

We have a pond that has had fish killed by river otters. We have stocked fish in the pond and the river otters have come in and cleaned the pond out of fish. We would like to have this farm pond as a recreation for family and friends to fish in.

Sincerely,

Rick and Deb Risley

Sent from my iPad *Kentland IN NEWTON CO. IN*

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me Today at 10:56 AM
To: Ross Mallatt, Randy Hall, Jon Artie Clark

Got it-- thanks Rick

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The Digital Check this out! Action needed: This could be one of 10:37 AM
Six Month...
river otters(2) People

me DNR officials: In 1995 303 river otters from Louisiana were Today at 11:30 AM

me To me Today at 11:30 AM

DNR officials:

In 1995 303 river otters from Louisiana were released in 12 locations in Indiana. This was probably done to reintroduce and indigenous animal that was virtually wiped out in the early 1900s as a result of indiscriminate killing and trapping. The results of this reintroduction, although well intentioned has been disastrous for landowners having a lake or pond. These animals appear to be cute and playful but are in fact, voracious in the killing of gametfish in private ponds. A proposal to trap these animals would be helpful but they also need to be removed from any protected status that they now have. A landowner should not be penalized or prosecuted for protecting and enjoying his own property.

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1753 Esther Ct
Plainfield, IN 46168

by McAfee PROTECTOR on Web

Penelope Price
9480 S. Pointe LaSalle's Dr.
Bloomington, IN 47401-9024
812-824-8585
penelopeprice@juno.com

Natural Resources Commission
Indiana Government Center North
100 N. Senate Ave., Room N501
Indianapolis, IN 46204

TO WHOM IT MAY CONCERN:

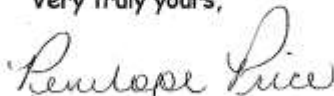
I am writing to express my dismay and opposition to your proposal to allow a trapping season for river otters.

I was a financial supporter of the purchase and release of the river otters at the various locations around the state. When such monetary support was sought, no mention was ever made that the purpose of this reintroduction was to enable future "harvesting" of otters by trappers. Had I been aware of this plan, I would never have donated one cent! I believe the public was intentionally misled.

I can understand there might be specific instances where an otter or otters might need to be removed in order to prevent damage to a citizen's property. Such situations are understandable. However, I think it is absolutely despicable to allow trapping of these animals specifically for their fur.

I am very, very disappointed in your intentions and vehemently oppose this proposition!

Very truly yours,



Penelope Price

806 East Second Street extended
North Manchester, IN 46962
December 9, 2014

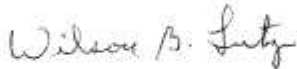
Natural Resources Commission
Indiana Government Center North
100 North Senate Avenue
Room N501
Indianapolis, IN 46204

Dear Natural Resources Commission,

The following summarizes my comments on the proposed resumption of river otter trapping:

Our biological cousins, the river otters, were extirpated from Indiana in the early 1900s. The reason was human indifference and neglect. In the late 1900s, otters were reintroduced. I attended one of the releases. These attractive animals belong in Indiana. In northern Wabash County, people enjoy watching otters gambol on the rocks in the Eel River below the dam at the Stockbridge Mill. They enjoy seeing them in the river near Manchester University. I live on the Eel River near North Manchester. I have not yet seen an otter along my stretch of the river but I look forward to doing so. What possible good can accrue from establishing a trapping season? Could it be that the IDNR needs the money that would come in from issuing trapping licenses? If that is the case I would prefer to have my taxes increased instead. I vote NO on a trapping season for otters.

Sincerely,



Wilson B. Lutz, 12/9/2014

I am a retired teacher of biochemistry and geology.

6620 E. State Road 45
Bloomington, IN 47408
December 8, 2014

Natural Resources Commission
100 N. Senate Ave, Room N501
Indianapolis, IN 46204

Dear Sirs:

I am writing to comment on plans for river otter trapping as I cannot attend the meeting in Plainfield.

As someone who has supported the non-game wildlife and reintroduction efforts for over 20 years, I urge you to reject otter trapping at this time. There is no evidence that otters are over-populating Indiana waters. Trapping is an unnecessary and often cruel practice.

You will continue to lose support from the public if you use our dollars to reintroduce species only to kill them.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mary K. Rothert".

Mary K. Rothert

9754 S NO E
MILROY IN 46156
DECEMBER 8, 2014

NATURAL RESOURCES COMMISSION
INDIANA GOVERNMENT CENTER
INDIANAPOLIS IN 46204

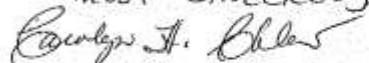
RE: PROPOSED RIVER
OTTER TRAPPING
SEASON

TO THE COMMISSIONERS:

WHEN THE FIRST RE-INTRODUCTION OF
RIVER OTTERS TOOK PLACE (AT THE
MUSCATATUCK RIVER), WE DONATED TO
SPONSOR AN OTTER AND HAVE PROUDLY
REFERRED TO OURSELVES AS "OTTER PARENTS!"

I'M SURE THE OTTERS RELEASED ARE DOING
WELL OR THIS TRAPPING SEASON WOULD
NOT HAVE BEEN SUGGESTED, BUT WE CAN'T
BEAR THE THOUGHT OF "OUR OTTER" BEING
TRAPPED AND SLAIN. PLEASE DO NOT
OPEN A SEASON ON THEM!

MOST SINCERELY,



CAROLYN H. CLELAND and
ARTHUR C. CLELAND

PH: (965) 629-2346

12-11-14

To: The Natural Resources Commission

Re: River Otter Trapping Season

From: Gail Moon
9327 E. 106th St.
Fishers, IN 46037

Members of the Commission,

I am present tonight to protest a river otter trapping season. Trapping is a reprehensible and barbaric practice and should not be allowed in any capacity, anywhere. The story in the November 13 Indianapolis Star was most enlightening. It is very interesting that the river otter was brought back into the state by trappers. Any conflict of interest here? Why not leave well enough alone? Why bring an animal back to Indiana to face the horrors of trapping?

I would ask that you please read the attached articles. I would also ask how you can defend a practice that inflicts such a horrendous degree of pain...and to what end...a pelt. It is unconscionable that in 2014 this practice is still allowed. How, in the name of protecting natural resources, is such misery allowed? An animal caught in a trap endures horrendous, agonizing injury and can't even escape the elements unless, of course, they chew off their leg. After enduring this horror for days, they will be clubbed, suffocated or strangled to death. It is incomprehensible that this is still allowed.

I ask that a trapping season for otters not occur. As a tax payer and citizen of this state, I also ask that all animals under the care and control of the DNR be treated humanely. Trapping is the most inhumane population control method one could ever imagine - and to consider it a form of recreation is even worse. Please find a better solution for this situation.

Thank you,

Gail Moon

Exposing the Myths: The Truth about Trapping

<http://www.bornfreeusa.org/facts.php?p=53&more=1>





Get The Facts:

Exposing the Myths: The Truth about Trapping

Each year, more than 4 million animals are trapped and killed for their fur in the United States. Millions more are trapped and killed in the name of "livestock" and "game" protection and for "nuisance" animal control. Whatever the purpose, the consequences for the trapped animals are the same — pain, suffering, and death. Proponents argue that traps are humane and selective, and that trapping is tightly regulated, an important source of income for many people, and necessary for managing wildlife. These claims, however, are far from the truth.

Myth: Trapping is humane and selective.

Despite what trappers would have you believe, animals frequently sustain severe injuries from being trapped. When not killed outright by the trap, animals can suffer physiological trauma, dehydration, exposure to severe weather, and predation by other animals until the trapper returns. When the trapper returns he usually clubs, suffocates or strangles the animal to death. Fur trappers rarely shoot trapped animals because bullet holes and blood reduce a pelt's value.

Traps set in or near water are designed to drown aquatic mammals, which can take up to 20 minutes for some species.¹ The American Veterinary Medical Association deems drowning to be inhumane and a 1999 study concluded "drowning cannot be considered euthanasia."²

Most traps are notoriously indiscriminate, capturing almost any animal that triggers them. Sometimes called "trash" animals by trappers, non-target species that have been found in traps include threatened and endangered species, raptors, domestic dogs and cats, and even humans. These animals can sustain the same injuries as target species. Even if released, they may perish later from internal injuries or reduced ability to hunt or forage for food.

There are three general types of traps used today: **restraining body-gripping traps**; **kill traps**; and **live traps**. Restraining and kill traps are most often used for commercial and recreational fur trapping as they are cheap, portable, and easy to set. Live traps are more often used by private "nuisance" animal control trappers for trapping raccoons, cats, skunks, etc.

The most commonly used trap in the U.S. is the **steel-jaw leghold trap**, a restraining trap with spring-loaded steel jaws that clamp on an animal's foot or leg when triggered. Leghold traps can cause severe swelling, lacerations, joint dislocations, fractures, damage to teeth and gums, self-mutilation, limb amputation, and even death.³ The steel-jaw leghold trap has been declared inhumane by the American Veterinary Medical Association, the American Animal Hospital Association, and the National Animal Control Association, and has been banned or severely restricted by more than 80 countries and 8 U.S. states.

Dick Randall, a former federal trapper, told Congress, "My trapping records show that for each target animal I trapped, about two unwanted individuals were caught. Because of trap injuries, these nontarget animals

had to be destroyed.⁴ Nontarget animals comprised 76% of all animals captured in leghold traps in a 1981 study.⁵ Although trappers may use **pan tension devices**, which may exclude smaller "nontarget" species by increasing the force needed to trigger a trap, species similar in weight or larger than the target species are still captured.^{6,7}

In response to criticism over the steel-jaw leghold trap, trap manufacturers designed the **padded leghold trap**, which has thin strips of rubber attached to the trap's jaws. Padded traps can reduce limb injuries in some species. However, they can still cause serious and debilitating injuries. For example, a 1995 study by the USDA's Animal Damage Control program (now called "Wildlife Services") found 97% of coyotes caught in padded traps had severe swelling of their trapped limb, 39% had lacerations, and several had simple or compound fractures.⁸ Despite such findings, and even though as of 1992 less than 2% of traps owned by U.S. trappers were padded leghold traps,⁹ trapping proponents claim that padded jaw traps have made trapping "humane."

Other modified leghold traps include the **offset jaw** and **laminated jaw** traps, though these devices have also been found to cause serious injuries.

Snares are primitive wire nooses that, depending on how they are set, are designed to tighten around an animal's leg (restraining trap) or neck (kill trap). Some researchers suggest that certain **leg snares** may be a more humane alternative to jaw-type leghold traps, but research has been limited.

While small victims of **neck snares** may become unconscious in five to ten minutes from strangulation, larger animals may suffer for days. In one study, researchers recommended neck snares not be used in areas with livestock or deer after snares set for coyotes killed 50% of deer accidentally captured.¹⁰ The Federal Provincial Committee on Humane Trapping concluded after years of study that these snares "do not have the potential to consistently produce a quick death."¹¹

Conibear traps are **kill traps** consisting of two metal frames hinged at the center point and powered by two torsion springs to create a scissorlike action. Conibear traps are supposed to kill animals instantly by snapping the spinal column at the base of the neck. However, traditional Conibear traps kill less than 15% of trapped animals quickly, and more than 40% die slow, painful deaths as their abdomens, heads, or other body parts are crushed.¹² Some newer modifications have improved the Conibear's killing ability,³ but for only a few species, and mostly in controlled lab settings. Conibear traps are also notoriously indiscriminate and have been shown to capture 2 nontarget animals per target animal.¹³

Myth: Trapping is tightly regulated.

Trapping regulations vary widely from state to state and are, in general, poorly enforced. Many states have few restrictions on the types of traps that can be used or the number of animals that can be trapped. Only a handful of states require or offer trapper education courses so most trappers learn "in the field." Four states do not require trappers to check their traps at all, and twenty states allow animals to suffer in traps for 2 to 4 days. Only Georgia regulates how a trapped animal must be killed.

Very few states monitor the number of target animals trapped each year, and most do not require trappers to report nontarget captures at all. Some state wildlife agencies rely on voluntary or mandatory "fur dealer/buyer reports" to estimate annual trapping totals. Others obtain their data through random telephone or mail surveys, then use these partial reports to estimate the total numbers of animals trapped each year. Additionally, millions of animals are trapped by private "nuisance wildlife control operators" — or NWCOs — in this growing and largely unregulated industry.¹⁴

Myth: Only abundant species are trapped.

Historically, unregulated trapping almost wiped out beaver, sea otter, lynx, wolverine, and other species in many areas of the U.S. Today, some state wildlife management agencies continue to allow the trapping of highly sensitive species, including wolverine, fisher, marten, kit fox, and lynx. For example, while the U.S. Fish and Wildlife Service (FWS) considered listing the Canada lynx under the Endangered Species Act, Montana continued to allow lynx to be commercially trapped — even when a 1999 U.S. Forest Service report

concluded, "Lynx appear to be extremely susceptible to trapping, and where trapping is permitted it can be (and has been) a significant source of mortality."¹⁵ Unfortunately, because population modeling and furbearer data collection are so poor in many states, we do not know the impact trapping has on sensitive species — often until it is too late.

Myth: Trapping is a necessary wildlife management tool.

Trappers and wildlife managers claim that trapping prevents species from overpopulating and destroying their habitat by removing "surplus" animals from the wild. This simplistic argument, however, belies the dynamics of wildlife populations. First, the term "surplus" as used by trappers is an ecological fallacy — every animal, alive or dead, plays an important role in its ecosystem as either predator or prey. Second, available habitat and food resources generally limit the size of wildlife populations. When a wildlife population approaches the limit that the habitat can sustain — the "carrying capacity" — reproduction and survival decrease because less food is available to each individual, and the population begins to decline. In this way, nature has been regulating itself for millennia without our help.

Trapping generally removes healthy individuals from the population rather than the sick, aged, infirm, or very young animals most often subjected to natural selection. It would be "blind luck" if a trapper were to trap an animal that would have otherwise died of starvation or any other natural cause, so trapping actually works against nature's selection process.

In truth, trappers are mainly interested in manipulating wildlife populations for their own benefit. State wildlife agencies actively manage populations of furbearers to ensure that there are enough animals for trappers to kill, not to prevent biological overpopulation.

Myth: Trapping controls the spread of disease.

Trappers and wildlife managers play on the public's fear of rabies and other diseases by arguing that trapping is necessary to control the spread of disease. However, the Centers for Disease Control, the National Academy of Sciences, and the World Health Organization, as well as many other scientific, public health, and veterinary organizations, disagree. The National Academy of Sciences subcommittee on rabies concluded that, "Persistent trapping or poisoning campaigns as a means to rabies control should be abolished. There is no evidence that these costly and politically attractive programs reduce either wildlife reservoirs or rabies incidence. The money can be better spent on research, vaccination, compensation to stockmen for losses, education and warning systems."¹⁶

Rather, trapping can actually *increase* the spread of disease.¹⁷ By removing mature animals who have acquired immunity to disease, trappers make room for newcomers who may not be immune. In addition, animals infected with rabies do not eat during the latter stages of the disease, and therefore do not respond to baited traps. Hence, traps set in an area infected with rabies will more than likely capture healthy animals rather than infected animals, thereby increasing the likelihood that the disease will spread.

Myth: Fur trapping provides significant income for many Americans.

Trapping and fur industry proponents claim trapping provides a viable income for many Americans. However, surveys show that most trappers trap for "sport" and a little extra income. In response to a 1997 API survey, state wildlife agencies indicated that income from trapping was either extremely low or non-existent. A 1992 Missouri Department of Conservation study reported that "approximately 30% of all trappers in 1991 reported no household income from trapping ... Most trappers reported earning small incomes from trapping. This suggests that motives other than monetary gain are also important to trappers. The average cost of trapping per day was \$30.67." Today fur trapping is little more than a hobby.

The trapping of wildlife for profit is an anachronism in today's society. Its blatant cruelty can no longer be masked under the guise of economics or wildlife management. However, the trapping/fur lobby is powerful and well-funded, and countering its entrenched political power requires dedicated, passionate citizens who recognize that wildlife has intrinsic worth above and beyond its economic value. We encourage you to get involved.

Fur & Trapping Facts

Total Trapping Licenses sold in the U.S. in 1997-98: 130,400

Top Five Species Trapped in the U.S. (1997-98) *

Raccoon ... ~2,097,000
Muskrat ... ~1,993,000
Nutria ... ~398,000
Beaver ... ~295,000
Opossum ... ~234,000

Select List of Other Species Trapped in the U.S. (1997-98) *

Mink ... ~164,000
Coyote ... ~159,000
Red Fox ... ~139,000
Otter ... ~25,500
Gray Wolf ... ~1,280

Top 5 Trapping States -- Total Animals Trapped (1997-98) *

Wisconsin ... ~695,000
Pennsylvania ... ~581,000
North Dakota ... ~515,000
Louisiana ... ~468,000
Minnesota ... ~430,000

**Figures may include animals killed by means other than trapping due to poor record keeping by agencies.*

Number of animals used to make an average length fur coat:

Badger	20 Mink (Ranch)	60
Beaver	15 Otter	14
Bobcat	15 Rabbit	30
Chinchilla	100 Raccoon	27
Coyote	16 Red Fox	18
Ermine	125 Sable	40
Lynx	11 Silver Fox	11

State Leghold Trapping Bans

- **FL (1973)** — Steel traps banned except by permit for animal damage control.
- **RI (1977)** — Steel-jawed leghold traps banned except by permit for animal damage control.
- **NJ (1984)** — Use, sale, manufacture, possession, import, and transport of steel-jaw leghold traps banned.
- **AZ (1994)** — Leghold traps, instant kill body-gripping traps, and snares banned on public lands except for human health and safety, rodent control, wildlife research and relocation.
- **CO (1996)** — Leghold traps, instant kill body-gripping traps, and snares banned except for animal damage control, human health and safety, rodent control, wildlife research and relocation.
- **MA (1996)** — Steel-jaw leghold traps, padded leghold traps, Conibear traps, and snares banned except for human health and safety; Conibears only allowed by permit for damage control.
- **CA (1998)** — Use of body-gripping traps for recreation or commerce, and commerce in raw fur from animals trapped with body-gripping traps, banned; steel-jaw leghold trap banned for all purposes except padded leghold trap for human health and safety.
- **WA (2000)** — Use of body-gripping traps for recreation or commerce, and commerce in raw fur

from mammals trapped with body-gripping traps, banned; use of body-gripping traps banned except Conibear trap in water, padded leghold trap, and foot snare allowed by permit for human health and safety, endangered species protection, wildlife research, or for unrelieved damage control.

What You Can Do

- Don't buy or wear fur, fur-trimmed items, or anything made with fur, such as cat toys.
- Help educate people about the cruelties behind fur by distributing Born Free USA united with API's fur information card (contact Born Free USA united with API).
- Contact businesses that sell fur and tell them you will cease doing business with them until they stop selling fur products.
- If you own property, clearly post signs prohibiting trapping on your land. Prosecute violators.
- Encourage your local community to utilize nonlethal methods of dealing with "nuisance" wildlife. (Look for our [*Humane Ways to Live with Wildlife*](#) brochures.)
- Support policy efforts that restrict or prohibit trapping.
- Share this fact sheet with a friend.

Notes:

- F. F. Gilbert and N. Gofton. "Terminal Dives in Mink, Muskrat and Beaver." *Physiology & Behavior* (1982) 28: 835-840.
- Ludders, *et al.* "Drowning is not euthanasia." *Wildlife Society Bulletin* (1999) 27: 666-670.
- see discussion in G. Proulx. "Review of current mammal trap technology in North America." Pp. 1-46 in G. Proulx, editor. *Mammal trapping*. Sherwood Park: Alpha Wildlife Research & Management Ltd., 1999.
- D. Randall. *Hearings before the Ninety-Fourth Congress to Discourage the Use of Painful Devices in the Trapping of Animals and Birds*. Washington, D.C.: U.S. Govt. Printing Office, 1975.
- M. Novak. "The foot-snare and the leg-hold traps: a comparison." *Proceeding of the Worldwide Furbearer Conference* (1981) 3: 1671-1685.
- F. J. Turkowski, *et al.* "Selectivity and Effectiveness of Pan Tension Devices for Coyote Foothold Traps." *Journal of Wildlife Management* (1984) 48: 700-708.
- R. L. Phillips and K. S. Gruver. "Performance of the Paws-I-Trip™ pan tension device on 3 types of traps." *Wildlife Society Bulletin* (1996) 24: 119-122.
- R. L. Phillips, *et al.* "Leg Injuries to Coyotes in Three Types of Foothold Traps." *Wildlife Society Bulletin* (1990) 18: 166-175.
- International Association of Fish and Wildlife Agencies Fur Resources Technical Committee. *Ownership and use of traps by trappers in the United States in 1992*. Washington: Fur Resources Technical Committee of the International Fish and Wildlife Agencies and the Gallup Organization, 1993.
- R. L. Phillips. "Evaluation of 3 types of snares for capturing coyotes." *Wildlife Society Bulletin* (1996) 24: 107-110.
- The Federal Provincial Committee on Humane Trapping. *Findings and Recommendations*.

- Canada: Federal Provincial Wildlife Conference, 1981.
- H. C. Lunn. *The Conibear Trap — Recommendations for its Improvement*. Humane Trap Development Committee of Canada, Canadian Federation of Humane Societies, 1973.
 - M. Novak. "Traps and trap research." Pp. 941-969 in M. Novak, J. A. Baker, M. E. Obbard, and B. Malloch, editors. *Wild furbearer management and conservation in North America*. North Bay: Ontario Trappers Association, 1987.
 - T. G. Barnes. "State Agency Oversight of the Nuisance Wildlife Control Industry." *Wildlife Society Bulletin* (1997) 25: 185-188.
 - L. F. Ruggiero et al. "The scientific basis for lynx conservation: qualified insights." in L. F. Ruggiero, et al., tech. eds. *The scientific basis for lynx conservation in the contiguous United States*. Gen. Tech. Rpt. RMRS-GTR-30. Ogden: U.S. Dept. Agriculture, Forest Service, Rocky Mountain Research Station, 1999.
 - National Research Council, Subcommittee on Rabies. *Control of Rabies*. Washington: National Academy of Sciences, 1973.
 - "Controlling Wildlife Rabies through Population Reduction: An Ineffective Method." *The Rabies Monitor*, Vol. 4, No. 1, Spring 1996.

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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

More Trapping Information From Gail Moon

The steel-jaw leghold trap has been declared inhumane by the American Veterinary Medical Association, the American Animal Hospital Association, and the National Animal Control Association, and has been banned or severely restricted by more than 80 countries and 8 U.S. states.

Dick Randall, a former federal trapper, told Congress, "My trapping records show that for each target animal I trapped, about two unwanted individuals were caught. Because of trap injuries, these nontarget animals had to be destroyed."⁴ Nontarget animals comprised 76% of all animals captured in leghold traps in a 1981 study.⁵ Although trappers may use **pan tension devices**, which may exclude smaller "nontarget" species by increasing the force needed to trigger a trap, species similar in weight or larger than the target species are still captured.⁶

In response to criticism over the steel-jaw leghold trap, trap manufacturers designed the **padded leghold trap**, which has thin strips of rubber attached to the trap's jaws. Padded traps can reduce limb injuries in some species. However, they can still cause serious and debilitating injuries. For example, a 1995 study by the USDA's Animal Damage Control program (now called "Wildlife Services") found 97% of coyotes caught in padded traps had severe swelling of their trapped limb, 39% had lacerations, and several had simple or compound fractures.⁸ Despite such findings, and even though as of 1992 less than 2% of traps owned by U.S. trappers were padded leghold traps,⁹ trapping proponents claim that padded jaw traps have made trapping "humane."

Snares are primitive wire nooses that, depending on how they are set, are designed to tighten around an animal's leg (restraining trap) or neck (kill trap). Some researchers suggests that certain **leg snares** may be a more humane alternative to jaw-type leghold traps, but research has been limited.

While small victims of **neck snares** may become unconscious in five to ten minutes from strangulation, larger animals may suffer for days. In one study, researchers recommended neck snares not be used in areas with livestock or deer after snares set for coyotes killed 50% of deer accidentally captured.¹⁰ The Federal Provincial Committee on Humane Trapping concluded after years of study that these snares "do not have the potential to consistently produce a quick death."¹¹

Conibear traps are **kill traps** consisting of two metal frames hinged at the center point and powered by two torsion springs to create a scissorlike action. Conibear traps are supposed to kill animals instantly by snapping the spinal column at the base of the neck. However, traditional Conibear traps kill less than 15% of trapped animals quickly, and more than 40% die slow, painful deaths as their abdomens, heads, or other body parts are crushed.¹² Some newer modifications have improved the Conibear's killing ability,³ but for only a few species, and mostly in controlled lab settings. Conibear traps are also notoriously indiscriminate and have been shown to capture 2 nontarget animals per target animal.¹³

Trappers and wildlife managers claim that trapping prevents species from overpopulating and destroying their habitat by removing "surplus" animals from the wild. This simplistic argument, however, belies the dynamics of wildlife populations. First, the term "surplus" as used by trappers is an ecological fallacy — every animal, alive or dead, plays an important role in its ecosystem as either predator or prey. Second, available habitat and food resources generally limit the size of wildlife populations. When a wildlife population approaches the limit that the habitat can sustain — the "carrying capacity" — reproduction and survival decrease because less food is available to each individual, and the population begins to decline. In this way, nature has been regulating itself for millennia without our help.

Trapping generally removes healthy individuals from the population rather than the sick, aged, infirm, or very young animals most often subjected to natural selection. It would be "blind luck" if a trapper were to trap an animal that would have otherwise died of starvation or any other natural cause, so trapping actually works against nature's selection process.

In truth, trappers are mainly interested in manipulating wildlife populations for their own benefit. State wildlife agencies actively manage populations of furbearers to ensure that there are enough animals for trappers to kill, not to prevent biological overpopulation.

EXHIBIT B**PUBLIC COMMENTS RECEIVED THROUGH THE COMMISSION'S ONLINE RULE DOCKET**

FW: River Otter Rule
 LSA Document #14-341
 Admin. Cause No. 14-054D

Commenter Name Erin Huang

City Indianapolis **County** MARION **State** IN

Organization (optional) The Humane Society of the United States

E-Mail Address ehuang@humanesociety.org

Comments On behalf of The Humane Society of the United States (HSUS) and our Indiana supporters we offer this written testimony in opposition to the initiation of a trapping season for river otters (*Lontra canadensis*) in Indiana. The river otter was extirpated from Indiana in 1942 and successfully reintroduced to the state during the 1990's. They now are said to be present in 87 percent of the state counties, where they range from rare to abundant. The state proposes to open a recreational and commercial trapping season that would allow individuals ten years or older to take two river otter during a season extending from mid-November to mid-March. We oppose the change of status for this species for the reasons summarized below.

Animal welfare concerns. While still often minimized by agencies and organizations supportive of the consumptive use of wildlife, animal welfare has become an increasingly important concern for the general public. Wildlife in the United States is held by state and federal agencies in the public trust, meaning that all citizens have reasonable and legitimate claims concerning its protection and conservation. In this case, intentional trapping and killing of river otters will involve both tools (e.g. body gripping traps) and strategies (e.g. drowning sets) that will cause unavoidable suffering and distress to wild animals that are highly social, sensitive and intelligent. This must be a consideration as well as a weighting factor in any change or refocus of management policies and practices. The concerns and interests of the general public, as well as agencies and organizations dedicated to animal welfare, protection and conservation must be heard and weighed, specifically as the social component to the resource a management plan as described below.

Resource management planning. The proposed rule suggests provisions for discretionary flexibility in the annual harvest quotas, restrictions in trapping allowances by county and suspension of trapping upon reaching local quotas, but this hardly suffices as a management plan to establish an empirical baseline from which both the trajectory for population recovery as well as ecological impact from harvest and removal is documented. Given the scope and sensitivity of the issue of harvesting a species so recently re-introduced and as yet so scarce in many parts of the state the need for a comprehensive planning and public outreach process is clear. Together with information on the social component of otter trapping as mentioned above, the population, ecological and environmental consequences must be addressed as well.

Recreational trapping is not wildlife damage management. Although the proposed rule changes are not specifically justified as a means to mitigate human-otter conflicts in Indiana, the inclusion of information about these suggests an oblique attempt to raise this claim. Arguments are often and variously made that commercial and recreational trapping balances wildlife populations and keeps them "healthy" while reducing potential conflicts with humans. These typically lie outside of the traditional paradigm of wildlife management, which focuses more on sustainable yield. Mechanisms already exist to deal with human-otter conflicts in Indiana, not the least of which is to instill greater understanding and respect for wild animals in the mind of the public. We applaud the state for such efforts and encourage its furtherance, but argue that a recreational and commercial trapping season would not be a reasonable or practical way in which to address conflict issues.

The restoration of river otter populations to parts of the country from which they had been extirpated is a significant and praiseworthy event in natural resource planning. Trapping and hunting of river otters contributed to the extirpation of the animal in Indiana, and it would irresponsible to allow for this activity, just as river otters have grown to a healthier population. We believe that the concerns expressed here should be weighted, considered, and formally acknowledged. The days in which the ethos of consumptive use dominated state and federal agencies are over. New constituencies and new voices are raised as part of the democratic process and they must be honored. Thank you for your consideration.

References:

Johnson, S.A. and K. A. Berkeley. 1999. Restoring rivers otters in Indiana. *Wildlife Society Bulletin* 27(2):419-427.

<http://www.in.gov/dnr/fishwild/7438.htm> accessed 14 July, 2014

Consideration of request for preliminary adoption of amendments to rule (312 IAC 9) governing the possession and sale of river otters and the sale of squirrel hides; Administrative Cause No. 14-054D.

E.g. Reiter, D.K., M. W. Brunson, and R.H. Schmidt, R.H. 1999. Public attitudes toward wildlife damage management policy. Wildlife Society Bulletin 27: 746-758.

Comment Received 9/18/2014 11:59:00 PM

Commenter Name Dennis Wendel

City Bryant **County** JAY **State** IN

E-Mail Address dwendel@onlyinternet.net

Comments Indiana has a large enough population of river otter to allow a trapping season. Otters are predators and their populations need controlled so they do not get overpopulated. I support a season in Indiana on otter.

Comment Received 9/27/2014 12:44:08 PM

Commenter Name Thomas J McKeon

City Indianapolis **County** MARION **State** IN

Organization (optional) No organization, just myself.

E-Mail Address tjethro@att.net

Comments To allow a hunting season for River Otters after the otters have been re-established here in Indiana after being hunted and trapped into extinction earlier the last century makes no sense and is a very poor rule. This idea seems analogous to California re-establishing the Condors and then allowing their hunting again. A similar analogy would be Wyoming allowing a hunting or trapping season on black footed ferrets if they get more established, or if Ohio had found a mate for Martha at the Cincinnati Zoo and got passenger pigeons re-established just so they could be hunted again. I am not a hunter, just a fisherman, but I release the fish I catch. I am not opposed to hunting. But for river otters, there is no good reason to hunt them. After much effort by the DNR in re-establishing these intelligent, social, playful animals and then once they get started to allow them to be trapped or shot (after their being hunted/trapped into extinction is bad reasoning and poor policy. No one eats them and with all the fur that is available from captive bred minks, etc., there is no reason to hunt them for their pelts. There are plenty of fur-bearing animals that may be hunted or trapped in Indiana, and these social animals do not need to be added to that list. Thank you. Thomas J McKeon, Indianapolis

Comment Received 10/2/2014 12:46:08 AM

Commenter Name Nick Erny

City Holland **County** DUBOIS **State** Indiana

E-Mail Address nickerny@yahoo.com

Comments I feel that the otter season is way over due in the state. Beside the fact that this valuable resource is going to waste, it will give property owners a better way to better their fisheries and protect their property and investments. I have seen first hand the damage they can do to boats, docks, and marinas, as well as the damage they can do to ponds, lakes and public waters by killing for fun. The 48 hour grace period is also a good idea to give trappers the chance to get their traps out and not risk catching another otter that will have to be given to the state.

Comment Received 10/3/2014 2:26:55 PM

Commenter Name Doug Webster

City Shelbyville **County** SHELBY **State** Ind

E-Mail Address Doug.Allen.Webster@gmail.com

Comments After looking over the proposed changes I like what I see. I hope everything goes as smoothly as it reads. Good luck

Comment Received 11/10/2014 12:00:35 AM

Commenter Name Dena Landers

City Evansville **County** VANDERBURGH **State** Indiana

E-Mail Address dldmom3@hotmail.com

Comments No to hunting season for river otters

Comment Received 11/11/2014 10:10:34 AM

Commenter Name Maria Partlow Duffy

City Bloomington **County** MONROE **State** Indiana

E-Mail Address mia.partlow@gmail.com

Comments I oppose the proposed rule to allow the trapping and hunting of river otters.

Comment Received 11/11/2014 5:08:37 PM

Commenter Name Susan Knose

City Westfield **County** HAMILTON **State** Indiana

E-Mail Address sknose@sbcglobal.net

Comments I oppose a law that would allow any hunting, trapping or trading in river otters or any river otter parts.

Comment Received 11/11/2014 5:30:39 PM

<p>Commenter Name Diane Miller City Fort Wayne County ALLEN State Indiana Organization (optional) Ms. E-Mail Address millerdiane100@gmail.com Comments Trapping of any animal is inhumane. Please let the river otter population continue to live lives in their natural habitat. A kinder world can begin with you. Comment Received 11/12/2014 7:40:41 AM</p>
<p>Commenter Name PHIL JAMES City SPENCER County OWEN State INDIANA E-Mail Address MASTERCUTLAWNSCA@AOL.COM Comments Have you ever felt extreme excruciating pain? This is what trapping consists of with any animals or humans. Traps are cruel and should be outlawed. What if your pet or wandering child was snared in a trap? Traps don't discriminate. Get the point!!! Comment Received 11/12/2014 6:44:21 PM</p>
<p>Commenter Name Harrison County trapper City Corydon County HARRISON State IN E-Mail Address mwernert@live.com Comments I'm glad the Otter season is finally being considered for adoption. There are too many Otters being wasted by being caught in legally set beaver sets due to a high population. The fish population in streams and rivers are suffering not to mention private ponds. I have seen an Otter in a private pond miles from the nearest stream. I think this first season is a wise move to properly manage the Otter population. Comment Received 11/12/2014 7:21:29 PM</p>
<p>Commenter Name Wayne Langman City Terre haute County VIGO State Indiana E-Mail Address sgtwal@aol.com Comments I want whole heartedly support this rule and ask the Commission to adopt it. To kill an animal and not make use of every possible part is simply a waste. To allow the sale of Squirrel skins is only sensible since we allow the tails to be sold. The taking of Otters is so common many trappers avoid water trapping just avoid the otters. And the numbers are well into the harvest range. Any rule to stop the waste of the animals would be a help. Comment Received 11/12/2014 9:28:26 PM</p>
<p>Commenter Name Jeremiah City Kendallville County NOBLE State Indiana E-Mail Address JERMS32@HOTMAIL.COM Comments I'm not sure of the whole proposal on trapping of river otters, but at this time I say no to trapping them. I personally have yet to see one in the wild and would hate to see a trapping season opened to early on them. Let's give it a few more years and let the population build even more. I'm sure it will be heavily regulated, but let's not open it up too soon. Thanks Jeremiah Montel Comment Received 11/12/2014 10:31:56 PM</p>
<p>Commenter Name Steve Reinholt City Commiskey County JENNINGS State Indiana E-Mail Address lco912@yahoo.com Comments I support the otter season proposal Comment Received 11/12/2014 10:41:39 PM</p>
<p>Commenter Name Jeffery Stoner City North Vernon County JENNINGS State Indiana E-Mail Address jas1736@yahoo.com Comments Otter have made a strong comeback in the Southeast part of Indiana near the Muscatatuck River; so much so that they are becoming a nuisance to small pond owners. A controlled trapping season would be helpful, and profitable for trappers. I'm not familiar with the populations in the North, but I would think that a rule that is more liberal South of I-74 like exists for some bird hunts might be appropriate. Comment Received 11/12/2014 11:28:55 PM</p>
<p>Commenter Name Kat Lakey City Indianapolis County MARION State Indiana E-Mail Address ryuuhouse@gmail.com Comments With guidelines to prevent repeat of over harvesting, the trapping of otter for fur is both appropriate, and time honored way to regulate over population. Too many otters are not good for anyone, least of all the otter. Comment Received 11/13/2014 6:05:28 AM</p>

<p>Commenter Name RUthann Croda City Carmel County HAMILTON State Indiana E-Mail Address RuthCroda@aol.com Comments I am against the trapping (drowning) of animals.... river otters and beavers. It is cruel to trap and drown these creatures!!! Comment Received 11/13/2014 6:52:02 AM</p>
<p>Commenter Name jerry st john City north vernon County JENNINGS State in E-Mail Address jstjohn11@hotmail.com Comments I an in total favor of allowing otter trapping in IN Comment Received 11/13/2014 7:24:45 AM</p>
<p>Commenter Name Tim Current City Williamsport County WARREN State IN E-Mail Address chemstructs@yahoo.com Comments I support the changes to this rule dealing with establishing a river otter trapping season. As always, if science is used in establishing the seasons and limits, there is no reason the Indiana otter population should not support a season. Comment Received 11/13/2014 7:37:59 AM</p>
<p>Commenter Name William Stoner City Oldenburg County FRANKLIN State IN E-Mail Address wwstoner@gmail.com Comments i spend my summers on a lake in Maine where I have the distinct pleasure of observing otters at play. I have never seen one in Indiana. Please continue to issue depradation permits where they are a nuisance. I have a private pond and would be delighted to host a family. Comment Received 11/13/2014 7:43:56 AM</p>
<p>Commenter Name David Delaney City indianapolis County MARION State indiana Organization (optional) none E-Mail Address eelriver50@yahoo.com Comments i support the trapping of river otters. i do believe it should be restricted to a certain number per year per person and only in certain counties. I personally know of several places where otters are quite numerous and believe that a limited trapping season is not a threat to the established population of otters. Comment Received 11/13/2014 8:02:28 AM</p>
<p>Commenter Name Tim Griffin City Rosedale County PARKE State Indiana E-Mail Address Bassbum0034@yahoo.com Comments I feel this is a good starting point for otter trapping season. After a couple of years it will need to be looked into again to see if the numbers need to be adjusted. Comment Received 11/13/2014 9:14:19 AM</p>
<p>Commenter Name Fred Philips, DVM City Rushville County RUSH State IN E-Mail Address fpp@juno.com Comments As an individual, I think that this is a good rule overall, and while I do not think that the ten year old limit is necessary, I like the idea of having the Trappers education Card. Thank you IDNR. Comment Received 11/13/2014 9:56:37 AM</p>
<p>Commenter Name David Jackson City Bear Branch County OHIO State Indiana E-Mail Address ico919@yahoo.com Comments I agree with a regulated otter season. Several landowners have had their ponds fished out by otters. Piles of fish bones along the shoreline tends to make landowners alittle upset. Hopefully a bobcat season will be next. I have several pictures of bobcats ranging from small kits to old toms. Comment Received 11/13/2014 10:01:50 AM</p>
<p>Commenter Name mike clabaugh City andrews County HUNTINGTON State in E-Mail Address mike3132@yahoo.com Comments Trapping should be allowed under strict regulations with tags issued for each kill. The tags should have to remain with the hide until sold. Otter harvest could be tele-checked just like turkey or deer. Comment Received 11/13/2014 10:07:49 AM</p>
<p>Commenter Name Gerald McClure City Flat Rock County SHELBY State Indiana E-Mail Address geraldmcclure@hotmail.com</p>

Comments I think we need a regulated otter season. I have a friend that lives in Ripley Co and he has one of my favorite fishing lakes. The otters have just about eaten all the fish in his lake. We need some relief

Comment Received 11/13/2014 10:08:21 AM

Commenter Name Tyler Staggs

City Noblesville **County** HAMILTON **State** Indiana

E-Mail Address tyler_staggs@hotmail.com

Comments I think the removal of river otter from these rules is a move in the right direction. Their reintroduction to the state is a conservation success! I think giving them some marketability will increase their value, both monetarily and non-monetarily, to the conservationists of the state.

Comment Received 11/13/2014 10:45:25 AM

Commenter Name Karen K Villarruel

City Crown Point **County** LAKE **State** Indiana

Organization (optional) --

E-Mail Address kvillarruel@gmail.com

Comments I would like to voice my opposition to the proposed amendment of 312 IAC 9-3-18.2 to allow for the trapping of river otters.

Comment Received 11/13/2014 11:21:47 AM

Commenter Name Caitlin Padula

City Munster **County** LAKE **State** Indiana

Organization (optional) 1985

E-Mail Address caitlinmpadula@gmail.com

Comments I am absolutely opposed to allowing the trapping of river otters. The river otter population was decimated by trapping; why allow trapping again once the population has recovered? A bag limit of 2 is setting itself up to be ignored and violated. While I'm sure fisheries have their own problems with otters, those could be solved by granting special nuisance trapping permits specific to the problem animals rather than permitting the wholesale trapping of otters which are not bothering any one.

Comment Received 11/13/2014 11:33:03 AM

Commenter Name Steve Cobb

City McCordsville **County** HANCOCK **State** In.

Organization (optional) Fur Takers Of America national & Indiana Chapters 7-b, 7-c, & 7-g

E-Mail Address styctrap@live.com

Comments Indiana definitely needs a river otter season & has needed one for quite some time now.

As far as a state wide quota, I would consider that totally unnecessary and actually detrimental to managing the specie in areas of dense populations.

State wide quotas could also affect the management of beaver in areas of high otter populations.

Thank you

Steve Cobb

Comment Received 11/13/2014 11:43:50 AM

Commenter Name Scott Schillig

City Grovertown **County** STARKE **State** IN

E-Mail Address esshup@mediacombb.net

Comments I'm in favor of it. Why have to throw away the fur of squirrels when there is a market for it? Use of renewable resources is a good thing. I also am in favor of allowing the sale of pelts from River Otters. If the population is large enough to support it, why not?

Comment Received 11/13/2014 12:03:53 PM

Commenter Name Greg Yazel

City Greensburg **County** DECATUR **State** Indiana

E-Mail Address gyazel@starenv.net

Comments I am in favor of a controlled harvest of river otters where populations allow.

Comment Received 11/13/2014 12:17:08 PM

Commenter Name Donna Reinholt

City Commiskey **County** JENNINGS **State** Indiana

E-Mail Address Djreinholt@yahoo.com

Comments I support DNR proposed otter trapping season

Comment Received 11/13/2014 1:33:42 PM

Commenter Name Adam DeBeck

City South Bend **County** ST.JOSEPH **State** Indiana

E-Mail Address sjcdb25@gmail.com

Comments A once protected animal should only have their population artificially controlled for the purpose of

environmental greater good no for decoration/human desire. The overall wildlife population of our world continues to be affected by human interference due to deforestation, water pollution, and should be preserved and protected as if they were still endangered. Events put them in danger of extinction once, why couldn't they happen again. Thank you for your time.

Comment Received 11/13/2014 4:10:06 PM

Commenter Name Kalliopi Haramantas

City Crown point **County** LAKE **State** Indiana

E-Mail Address haramantask@yahoo.com

Comments I do not agree with this rule whatsoever. I believe that the otters should live in their home environment and not be treated like this. They should be able to live naturally and peacefully. We are continuously ruining nature's Beauty with our new world and pollution for our own satisfaction. Let us preserve some of nature's beauties.

Comment Received 11/13/2014 4:51:59 PM

Commenter Name L J Wantz

City Columbus **County** BARTHOLOMEW **State** Indiana

E-Mail Address lwantz@comcast.net

Comments While I am not a trapper, I do know the difference between preservation and conservation. All wild animals must be conserved. That is to say that we must manage the number of each species using hunting, fishing or trapping to keep a balance.

I support the controlled trapping of River Otters in Indiana.

Comment Received 11/13/2014 6:37:20 PM

Commenter Name Ryan McDuffee

City Springville **County** LAWRENCE **State** IN

E-Mail Address ryan.mcduffee@gm.com

Comments I support a controlled open trapping season on river otters in Indiana

Comment Received 11/13/2014 7:33:13 PM

Commenter Name Roberta Fisher

City Plainfield **County** HENDRICKS **State** Indiana

E-Mail Address rrfisher8355@sbcglobal.net

Comments Why do we need to start killing the river otters again? Don't we have enough animals we can kill in Indiana?

Comment Received 11/13/2014 8:27:12 PM

Commenter Name Jim Sweeney

City Schererville **County** LAKE **State** IN

Organization (optional) Mr.

E-Mail Address jp55biod@att.net

Comments As long as the rules protect a safe and growing population of otters in the state, I support the rule being proposed to allow trapping of river otters in Indiana.

Comment Received 11/14/2014 8:09:51 AM

Commenter Name Beth M

City Indianapolis **County** MARION **State** IN

E-Mail Address bmeyer@cstoneindy.com

Comments I do NOT support the murder of innocent animals, no matter how "bothersome" some people think they are. I am against this Rule.

Comment Received 11/14/2014 3:14:51 PM

Commenter Name Jessica Warfel

City Martinsville **County** MORGAN **State** Indiana

E-Mail Address jessicawarfel@gmail.com

Comments It brings me great joy to see that river otters have started to make a successful comeback in Indiana to the point that they have become a bit of a nuisance. I have yet to see one in the wild but it sounds like the way things are going that opportunity will present itself eventually. Obviously with our human population, conflicts with these playful little critters are inevitable and there needs to be a way to resolve these conflicts. Unfortunately, or fortunately as we know trapping is a very effective way to do this.

If the input of biologists is that river otters are at a population sustainable enough to harvest, then I am in agreement with the proposed rule changes as long as the quotas are set by biologists and not politicians and that the trapping season will be taken away if it is shown that the numbers harvested are too high for the population to sustain.

Comment Received 11/14/2014 5:17:19 PM

Commenter Name Denise Huston

City Yorktown **County** DELAWARE **State** IN

E-Mail Address dez.dono@gmail.com

Comments NO.

Comment Received 11/14/2014 11:18:51 PM

Commenter Name Gregory S. Griffin

City Shelbyville **County** SHELBY **State** Indiana

Organization (optional) Member Nature Conservancy and Friends of Goose Pond

E-Mail Address gs_griffin@yahoo.com

Comments Hoosiers Should Not Be Allowed To Trap River Otters For Their Fur Again in Indiana: It took us years to restore our river otter populations back to anything close to what they once were before over-trapping, poaching, etc., killed them all off in the name of greed for the little money their pelts would bring. When will we ever learn to leave nature alone? - "Live and let live" and not cruelly trap/kill a poor defenseless animal that's struggling to survive in the wild and only now making a comeback "finally" after we mended the destruction that we (fur trappers) caused. And then to add insult to injury to non-trapping citizens' common sense, DNR/the State has proposed a long trapping season from Nov. 15 to Mar. 15 which ought to again immediately damage the river otter populations that we've just worked years to re-build; it's ludicrous the way Indiana does things to pacify/accommodate strong lobby interests, like the Indiana State Trapper's Association and the NRA. And then for the ISTA to suggest that trapping is the only way to manage the current recovering otter population (just removed from the endangered species list in Indiana in 2005), it's a ridiculous argument when that's what caused the river otters to all but disappear in Indiana. If we're talking about trapping and moving river otters to areas of Indiana that still do not have the numbers of otters that were slaughtered off by trappers/ fur hunters previously; I'd be all for that, but no more trapping/killing river otters for greed and their \$80 fur pelts – C'mon Man only \$80– it's a living animal you're taking out of nature forever! Give the river otters a home/sanctuary in Indiana for our children and future generations to enjoy! Let's do constructive things / resource conservation, for example, with our tax dollars in Indiana!

Comment Received 11/14/2014 11:59:18 PM

Commenter Name Greg Griffin

City Shelbyville **County** SHELBY **State** Indiana

Organization (optional) Mr.

E-Mail Address gs_griffin@yahoo.com

Comments Hoosiers Should Not Be Allowed To Trap River Otters For Their Fur Again: It took us years to restore our river otter populations back to anything close to what they once were before over-trapping, poaching, etc., killed them all off in the name of greed for the money their pelts would bring. When will we ever learn to leave nature alone? - "Live and let live" and not cruelly trap/kill a poor defenseless animal that's struggling to survive in the wild and only now making a comeback "finally" after we mended the destruction that we (fur trappers) caused. And then to add insult to injury to non-trapping citizens' common sense, DNR/the State has proposed a long trapping season from Nov. 15 to Mar. 15 which ought to again immediately damage the river otter populations that we've just worked years to re-build; it's ludicrous the way Indiana does things to pacify/accommodate strong lobby interests, like the Indiana State Trapper's Association and the NRA. And then for the ISTA to suggest that trapping is the only way to manage the current recovering otter population (just removed from the endangered species list in Indiana in 2005), it's a ridiculous argument when that's what caused the river otters to almost become extinct in Indiana. If we're talking about trapping and moving river otters to areas of Indiana that still do not have the numbers of otters that were slaughtered off by trappers/ fur hunters previously; I'd be all for that, but no more trapping/killing river otters for greed and their \$80 fur pelts – C'mon Man \$80– it's a living animal your taking out of nature forever! Give the river otters a home/sanctuary in Indiana for our children and future generations to enjoy! Let's do constructive things / resource conservation, for example, with our tax dollars in Indiana!

Comment Received 11/15/2014 12:09:52 AM

Commenter Name Gail C. Griffin

City Shelbyville **County** SHELBY **State** Indiana

E-Mail Address ms0i002@aol.com

Comments I find it hard to believe that the population of river otters is too large in Indiana. We have gone in search of them to watch them at Muscatatuck National Wildlife Refuge and not seen even one. Its most probably the fact that ISTA is pressuring DNR to allow them to trap the otters for their pelts. We are going to take away the life of an animal for \$80 ??? Really??? How is that fun or good sport. Its just mean. These people do not need to do this to live. Try working for a living! If someone abuses a dog, we can procecute them but Indiana will allow someone to inhumanely trap an animal and condone it. Animals have been to known to chew off their own leg to get out of traps. Trapping should be banned altogether!! We need to stop playing God. People need to understand that God put them on this earth too. Humans are not the only animals on the earth! If the otters are effecting commercial hatcheries, then no-kill/no-harm trap them and move them to areas where they are not plentiful, such as Muscatatuck. I understand that they could effect the hatcheries profits, but why do we have to kill them?? DNR...do your job and help the animals! Very disappointing that you would want to kill them. Seems like the easy way out. If you need volunteers to help move them to other areas, I am sure you could get plenty! Thanks for listening.

Comment Received 11/15/2014 9:37:25 AM

Commenter Name David Watson

City Indianapolis **County** MARION **State** IN

E-Mail Address daveewatson@gmail.com

Comments I support the proposal to legalize trapping of river otters in those areas where their population exceeds what responsible wildlife biologists recognize as a healthy population level.

This comment, and the additional comments below, are based on the information I read in the Indianapolis Star:

1. The re-introduction of river otters to Indiana has been successful at restoring their population to levels that, in some instances, justifies population control. This is a success that is partly thanks to trappers who raised funds for this effort. I am not a trapper. But I believe they could be helpful in additional efforts beyond this one with river otters, and if we want their sustained help, they should share in the rewards of their success.

2. The target population level should be well-publicized so that those both for and against trapping of river otters are working from the same information base. They can disagree about what the target should be, but they should share the same information about how many river otters that wildlife biologists have measured.

Thank you,

Comment Received 11/15/2014 2:44:13 PM

Commenter Name Gregory Griffin

City Shelbyville **County** OWEN **State** Indiana

E-Mail Address gsgriffin48@gmail.com

Comments River Otters of the USA, namely Lutra Canadensis, the North American River Otter while maybe not protected under the Endangered Species Act of 1973 and not protected in Indiana since 2005 as endangered. They are at least protected under International Trade Laws set in 1973 under the CITES treaty. CITES is a world wide treaty. It still stands firmly today. So I don't understand how you can be proposing trapping river otters in Indiana again for their fur, disguised by ISTA as animal population management. This is how the river otter was almost wiped out by trappers and poachers in Indiana before. Also, your proposed open season on river otters is not in accord with the CITES treaty and even it were, it is significantly too long for a recently endangered and threatened river otter population that has just recently shown signs of recovery. Completely against allowing river otters to ever be trapped in Indiana for their furs again.

Comment Received 11/15/2014 5:37:49 PM

Commenter Name BARBARA SOUTH

City INDIANAPOLIS **County** MARION **State** IN

E-Mail Address Partusha@att.net

Comments I don't understand why the State would go to the effort and expense to re-introduce the river otter only to legalize hunting them once the effort proved successful. To allow them to be hunted for engaging in normal animal behavior is absurd. I am STRONGLY opposed to this proposed rule. Having said that, I have little faith that you will take any opposition into consideration. Why do you ask for comments when you have no intention of listening to anyone who opposes what you clearly intend to do.

Comment Received 11/15/2014 6:06:38 PM

Commenter Name Debbie Fray

City Valparaiso **County** PIKE **State** IN

E-Mail Address dunedoer@aol.com

Comments Please do not allow river otters to be trapped. The population of otters is just now beginning to sustain itself. There is no need for the fur, as synthetic substitutes are more than satisfactory and trapping is certainly a less than humane manner with which to dispatch animals. I urge you to veto this change

Comment Received 11/15/2014 7:06:50 PM

Commenter Name Mrs. Andie Wolfensohn

City Long Beach, IN **County** LAPORTE **State** IN

E-Mail Address andreawolfensohn@yahoo.com

Comments Please, I'm pleading with you, not to go ahead with the trapping of River Otters for their fur! Please don't! They have to eat too! There's plenty of fish to go around for everyone, the otters and the fishermen !!!

Comment Received 11/15/2014 7:11:59 PM

Commenter Name Ted Harris

City Lafayette **County** TIPPECANOE **State** Indiana

Organization (optional) Past president NICHES Land Trust

E-Mail Address tharris@tctc.com

Comments I am opposed to a trapping season for river otters at this time. Maybe in some future year, but not yet while almost half of Indiana's counties show "Rare" or "Not Reported" for distribution. I live in a county where otter distribution is classified as "Abundant", yet I have not seen my first otter in the wild. Continue to deal with otters locally as "nuisance" animals, as needed; but please don't start a trapping season so early in this state's recovery program. Trapping can wait.

Comment Received 11/16/2014 8:53:26 AM

Commenter Name Travis strickland

City Oakland city **County** GIBSON **State** indiana

E-Mail Address tstrickland@farbestfoods.com

Comments Sounds very thought out. I like the quota system by county.

Comment Received 11/16/2014 3:25:11 PM

Commenter Name Cheryl Pierce

City Lafayette **County** TIPPECANOE **State** Indiana

<p>E-Mail Address cherylpierce@me.com</p> <p>Comments I find it outrageous that we would reintroduce river otters because they were virtually extinct only for indiana try and reintroduce legislation to trap and kill them. Has history taught us nothing? Is there a shortage of otter meats and furs to the point that we need to kill more of these wonderful creatures? You should be ashamed of yourselves for this.</p> <p>Comment Received 11/17/2014 11:09:18 AM</p>
<p>Commenter Name elaine emmi</p> <p>City bloomington County MONROE State IN</p> <p>E-Mail Address eemmi@hotmail.com</p> <p>Comments Please don't allow the trapping or hunting of otters. I find this very disturbing when otters were nearly extinct a very short time ago. Thanks for the opportunity to express a no to trapping of otters.</p> <p>Comment Received 11/17/2014 3:45:32 PM</p>
<p>Commenter Name Patti</p> <p>City Indianapolis County MARION State IN</p> <p>E-Mail Address sugarfive@hotmail.com</p> <p>Comments Just because the otters may be a nuisance to some people doesn't mean that they should be allowed to be killed. there are too many people in this world, do we go and shoot them? no. People can put up fences to keep the otters out. Pay lakes are asking for otters to take free food from them. We are infringing on the otters property and to take it out on them is wrong. You had no problem bringing them into the area and now you want to get rid of them? Its dispicable. Don't allow this to happen</p> <p>Comment Received 11/18/2014 5:02:01 PM</p>
<p>Commenter Name Chuck</p> <p>City Oakland City County PIKE State Indiana</p> <p>E-Mail Address crhhamer22@msn.com</p> <p>Comments We really need to pass a limited river otter trapping season. I myself have caught otters. Some I could release alive some not. The ones that were not alive I was informed by the Conservation Officer I contacted to leave it to rot on the bank. A terrible waste in my opinion. Indiana I feel can withstand a limited otter season without hurting its river otter population. Bob cats should also be discussed on a limited season also I feel</p> <p>Comment Received 11/18/2014 5:10:51 PM</p>
<p>Commenter Name steve bowman</p> <p>City indianapolis County MARION State indiana</p> <p>E-Mail Address sabowman@sbcglobal.net</p> <p>Comments I approve of a trapping season for river otters.</p> <p>Comment Received 11/18/2014 7:13:16 PM</p>
<p>Comment Received 11/18/2014 7:13:16 PM</p>
<p>Commenter Name Janis Keating</p> <p>City Cincinnati County HAMILTON State Ohio</p> <p>E-Mail Address Janis@WriteoutoftheBlue.com</p> <p>Comments With all the anti-fur sentiments these days, there's no reason to trap otters. These animals are important to the ecosystem, and Indiana should be grateful to have them. Don't enact this cruel law!</p> <p>Comment Received 11/19/2014 6:30:32 PM</p>
<p>Commenter Name Robbin Pelfrey</p> <p>City Aurora County DEARBORN State Indiana</p> <p>E-Mail Address rdpelfrey@comcast.net</p> <p>Comments No to trapping river otters!</p> <p>Comment Received 11/19/2014 7:48:15 PM</p>
<p>Commenter Name Jeff Miller</p> <p>City Montgomery Village County Out of State State Maryland</p> <p>E-Mail Address jeffrey.and.miller@gmail.com</p> <p>Comments I am opposed to this proposed rule. Conservation agencies have worked hard to re-establish otter populations in states where they were hunted to extinction. Allowing trapping and sale of otter parts/hides thwarts those efforts. Even if this rule was reworked to be more strict with hard limits on total statewide quota, allowing sales opens a pathway for poaching of otter populations both inside Indiana as well as outside the state.</p> <p>Please reconsider this rule and preserve these endangered species. Thanks.</p> <p>Comment Received 11/20/2014 7:15:02 AM</p>
<p>Commenter Name Wolfgang Gettmann</p> <p>City Hilden County Out of State State Deutschland</p> <p>Organization (optional) IUCN and IOSF</p>

<p>E-Mail Address dr.w.w.gettmann@web.de</p> <p>Comments As a zoologist and ecologist I give the advice not to introduce otter trapping!</p> <p>Comment Received 11/20/2014 10:11:30 AM</p>
<p>Commenter Name chris gambill</p> <p>City Terre Haute County VIGO State IN</p> <p>E-Mail Address cgambill@wcgfirm.com</p> <p>Comments I strongly support the rule change. They have become prevalent and unfortunately when caught are difficult to safely release. They will in practice become a by-product of beaver trappers. The number of trappers in Indiana will not have an adverse affect on populations of otters.</p> <p>Comment Received 11/20/2014 10:16:03 AM</p>
<p>Commenter Name Margaret Richardson</p> <p>City Dipton, Stanley County Out of State State United KIngdon</p> <p>E-Mail Address m.richard7@yahoo.co.uk</p> <p>Comments Please do not allow hunting of Otters in your State. It's not like you are a poor country where there is a financial need to hunt these beautiful animals. You would be talking about around 10000 Otters per year, if it is correct that you would allow 5500 hunters taking a quota of 2 each, this is a shocking amount. This new ruling would mainly be for the pleasure of the kill by the hunters and not for the good of either the Otter or the environment. Here in the UK we have spent many years reintroducing otters to our rivers and on the rare occasion we get to see them they are a pleasure to see and to photograph. The children here are taught about caring for Wildlife and the world around us, do you really want your children growing up in a world where they will learn that it is okay to do this?</p> <p>Comment Received 11/20/2014 11:28:18 AM</p>
<p>Commenter Name Valerie Borrell</p> <p>City London County Out of State State England UK</p> <p>E-Mail Address wildvalb@aol.com</p> <p>Comments Shame on you all if you allow otter hunting!</p> <p>Comment Received 11/20/2014 11:33:52 AM</p>
<p>Commenter Name Michael McLaughlin</p> <p>City Eureka County Out of State State California</p> <p>E-Mail Address briseboy@msn.com</p> <p>Comments 1. Otters, being predators, have reproductive rates which diminish when at or near habitat carrying capacity. It is not necessary, and very likely counterproductive to cause their numbers to remain below habitat carrying capacity. 2. A social species, insufficient information as to human take on the otter's social/family structure is known. Considerable evidence is mounting showing emotional stress in social mammals, and trapping amounts to animal abuse. 3. Trapping is inherently cruel method and should be eliminated in Indiana and the Untied States. This activity is utterly unnecessary, and in the modern heavily populated human world, sets an extremely negative example of behavior toward other species - Wild species must no longer be dismissed as mere financial resource or toys to abuse. This develops a human culture of sociopathy. Evidence shows that our society has trended that way, and thus, for valid human psychological and sociological reasons, trapping should be eliminated. 4. Mesopredators such as otters are a necessary part of a fully functioning ecosystem ONLY if they are allowed to attain ecologically effective numbers. Managing for hunting/trapping denies scientific understanding and possibly denies return to resilient, diverse ecosystems in riparian and lake/pond, wetland systems. Indiana wildlife management should instead attempt to develop toward ecosystem-based planning, evaluating possibilities of returning larger omnivores such as Ursus americanus, larger ungulates like Cervis canadensis, a fromer native species, and other inhabitants helping to diversify the diminished wildlife and flora now prevalent. Management should never be intended to diminish any species, unless that species reduces toward extinction a species more highly endangered. This cannot be said to be true of the river otter in Indiana. Thank you.</p> <p>Comment Received 11/20/2014 11:56:33 AM</p>
<p>Commenter Name Mrs Jane Kirkwood</p> <p>City Wishaw County Out of State State Lanarkshire</p> <p>E-Mail Address janeckirkwood@btinternet.com</p> <p>Comments I am utterly appalled at the proposal to introduce trapping of otters when so much effort was made to reintroduce this species after being wiped out by hunting/trapping in the first place! It appears to any right-minded individual that they were introduced solely for the barbaric purpose of trapping/hunting. Far from being a nuisance, they are a vital part of the ecosystem. Fish farmers, etc. should make proper effort to protect their fish stocks. Do you really want what appears to be a deserved worldwide reputation of killers for the fun/money of it? Shame on you!</p> <p>Comment Received 11/20/2014 12:00:32 PM</p>
<p>Commenter Name Nicole Weber</p> <p>City Pasadena County Out of State State MD</p> <p>E-Mail Address nicole4770@yahoo.com</p> <p>Comments Against otter trapping. Please do not reintroduce this cruelty.</p>

Comment Received 11/20/2014 7:13:34 PM

Commenter Name Nathan Roche

City Porto **County** Out of State **State** Portugal

E-Mail Address nathanroche@mac.com

Comments I would just like to comment from the other side of the Atlantic on behalf of the river otters. Please don't reintroduce a season for trapping of American River Otters, there is no need for it, we don't need animal fur and skins (whether trapped or from the dreadful fur farms) and trapping in the past has wiped out otters in many parts of the US, Europe etc. It is not humane and I am informed thousands of otters could be killed if you go ahead. I have seen otters a number of times in Scotland, sometimes unexpectedly while walking alone, sometimes with a group of birdwatchers or even on an organised otter watch; once saw wild river otters in a lake at Amherst, Massachusetts. This was a great experience. We should leave them in peace. Their lives are worth more than fur. Even where legally protected otters already face many hazards from road traffic and other human activities. This rule change would send the wrong message, be an ethical step backwards, that it's OK to kill for a small profit and create hazards for many kinds of animal by placing traps along rivers, rather you should be encouraging more respect for wildlife and their habitats.

Comment Received 11/20/2014 7:15:31 PM

Commenter Name Cameron Caine

City Aberdeen **County** Out of State **State** UK

E-Mail Address cameroncaine@hotmail.co.uk

Comments I am disappointed that this is even up for debate. There is a huge conservation effort globally to reintroduce otters and a protect them all over the world. Developed countries such as the US should be setting an example and protecting these creatures not allowing potentially huge culls.

What kind of message will this send to the developing world in places like Thailand and Tanzania if the US starts to allow trapping.

Comment Received 11/21/2014 4:26:47 AM

Commenter Name Grace Yoxon

City Broadford **County** Out of State **State** Scotland

Organization (optional) International Otter Survival Fund

E-Mail Address Grace@otter.org

Comments I cannot believe that you are thinking of bringing back otter trapping. The whole reason they went extinct in the first place was over hunting. You say you will have a quota but don't say what that quota is. You have no data on population numbers but say there are "many" - that is not a scientific definition. If you don't know how many you have how can you say it is sustainable?

You say you are getting more complaints about otters but that is really that people are becoming less tolerant of wildlife in general.

Otters are a great indicator of water and land quality and therefore Indiana should be proud of that and not wanting to start killing them again. It will just be a circle as you will kill too many and then have to bring them back. This has happened so many times in other places.

We were involved with the group who brought the otters back and again Indiana should be proud that they were so successful.

It would be wonderful if your state could stand up for what is right and not bring back trapping.

Comment Received 11/21/2014 4:40:28 AM

Commenter Name Maddie Hepburn

City Crawfordsville **County** MONTGOMERY **State** Indiana

E-Mail Address hepburn.steinway@yahoo.com

Comments I believe, after reading these rules, that the reintroduction of wolves is necessary. Coyotes, wolves, bobcats, cougars, foxes, and bears are otters' natural predators. But the coyote and bobcat population has not aided in the steadying of the otter numbers. When wolves were brought to Yellowstone they completely changed the WHOLE environment. Wolves hunt caribou/deer and the less deer the more trees and grass grow, leaving more food and homes for birds, squirrels, mice, beavers. With more of these animals, the fox population grew to a healthy number, and there were more birds, such as crows and eagles, who cleaned up the remains of the deer. The bear population was steadied as well. This even changed the course of the river. If wolves are brought to Indiana, the deer population would lower, there would be healthy numbers of foxes, bobcats, coyotes, the otter population would lower, the crops would be healthier, less raccoons, more grass and trees which would benefit lumber businesses, and it would most likely affect the Sugar Creek and the Wabash. Wolves play a very important role. They feed off the unhealthy deer, which keep the rest of them healthy, as well as the humans, and other hunters. I believe that wolves are necessary in our lives, the DNR needs to seriously consider this. Just do your research. Yellowstone was much better after the return of wolves, I believe Indiana would be a much better, productive, and wealthier place with wolves. Thank you.

Comment Received 11/21/2014 1:51:46 PM

<p>Commenter Name Caroline Thomson City Leuchars County Out of State State United Kingdom E-Mail Address clthomson2007@yahoo.co.uk Comments It is repulsive that state legislation is to be amended to allow the hunting of river otters. Have people really forgotten that otters became extinct in Indiana in the 1940s? It has taken a lot of hard work for their reintroduction and now this knee-jerk reaction to the otters' resurgence and ingenuity will put the population at risk once again. There must be better ways of protecting fish stocks etc. than to kill otters. Furthermore, it is abhorrent that of the 20 states where otters have been reintroduced, 11 have an otter hunting season. What kind of message does this kind of strategy send to other countries such as those in Asia, where otters are endangered by poor people who feel they have no other option? How can we change their views when well-off Americans see it as their right to kill these animals for fun?! Finally, the idea that CHILDREN aged only 10 can hunt these beautiful creatures is completely alien to civilised people. We no longer need "real" fur for clothing etc. - there are plentiful synthetic alternatives. Comment Received 11/22/2014 1:35:28 PM</p>
<p>Commenter Name Herb Higgins City Greenwood County JOHNSON State Indiana E-Mail Address dizzy_higg@hotmail.com Comments To open seasons and expand use of animals is a testament of the positive work that comes with conservation. This conservation is mostly done and supported by the sportsman's \$, showing that the sportsman is the true nature lover. I support this rule. Comment Received 11/24/2014 6:33:24 AM</p>
<p>Commenter Name Stu Grell City Attica County FOUNTAIN State Indiana (IN) Organization (optional) Indiana State Trappers Association E-Mail Address oneturkeyhunter@yahoo.com Comments All of us officers of the Indiana State Trappers Association have met with Shawn Rossler, our State Furberer Biologist, and we concur with the proposed rule change and proposed otter trapping season. As the Indiana State Director for the National Trappers Association, I can assure you that the NTA is also in agreement. Thank you. Comment Received 11/24/2014 12:33:37 PM</p>
<p>Commenter Name scott allen City monticello County WHITE State IN E-Mail Address biggin771970@yahoo.com Comments THANK YOU MR Rossler!!!! You walked into a soup sandwich with the river otters and dove in and took action! This law should have passed a few years ago. Comment Received 11/25/2014 8:45:36 PM</p>
<p>Commenter Name Mary Pribble City Kennard County HENRY State Indiana E-Mail Address pribble.mary@yahoo.com Comments Please don't allow trapping of the otters. Trapping is cruel and inhumane. Make the fish farmers put up fencing or other barriers to protect their fish. Why do the animals always have to pay the price when they clash with humans? Thank you for letting me comment. Comment Received 11/26/2014 10:11:46 PM</p>
<p>Commenter Name Vicki Burch City West Lafayette County TIPPECANOE State IN E-Mail Address vlburch@comcast.net Comments I agree with Joel Kerr's comment's in the November 16, 2014 publication of the Journal and Courier. To paraphrase, first we think it is a good idea to introduce them to Indiana, now it is not a good idea, so let's kill a lot of them. No good can come from reducing the otter population. If you want to stop something, stop the killing of "caged" deer. Comment Received 11/28/2014 2:25:32 PM</p>
<p>Commenter Name craig henderson City glendale County Out of State State California Organization (optional) Mr. E-Mail Address craigyh@gmail.com Comments Please stop the backward step that the reintroduction of otter hunting would be. We have expended time and money to reintroduce this amazing creature which adds to our natural heritage and has no value as a food source. If we allow hunting it sends the wrong message regarding animal skins/fur and makes environmental restoration programs seem pointless. Comment Received 11/30/2014 7:16:17 AM</p>
<p>Commenter Name L Turner City Portsmouth County Out of State State Hampshire E-Mail Address Zea2612@aol.com Comments Please stop the backward step that the reintroduction of otter hunting would be.</p>

We have expended time and money to reintroduce this amazing creature which adds to our natural heritage and has no value as a food source. If we allow hunting it sends the wrong message regarding animal skins/fur and makes environmental restoration programs seem pointless.

Comment Received 11/30/2014 8:07:54 AM

Commenter Name Mark Fridkin

City Grand Rapids **County** Out of State **State** MI

E-Mail Address markontime@gmail.com

Comments Please Indiana, don't re-hunt the otter to near extinction again. This is an opportunity to really keep Indiana's natural resources in sync with nature. It's not promoting otter proliferation, it's allowing it to exist normally without human intervention.

Thank you!

Comment Received 11/30/2014 11:00:49 AM

Commenter Name David Burns

City LONDON **County** Out of State **State** England

E-Mail Address db@edenfilms.com

Comments I would ask you to please remember that any laws allowing or condoning the skinning of animals for their pelts has international as well as national consequences. Anti-fur trade lobbying, particularly in the Western cultures, has made enormous inroads into encouraging people to not wear wild animal skins but even now in China, for example, quite literally millions of animals are skinned each year, often whilst still alive. Worldwide there are anti-cruelty to animals organizations fighting to stop this completely unnecessary barbarism. Please consider both the local and the wider implications before you grant permission to hunters to skin either squirrels or otters.

It took until 1833 for a politician (William Wilberforce) in London to persuade his government that the slave trade was wrong. We look back and cannot understand how the government at the time could have supported and condoned such an appalling trade. Now, over 180 years later, other areas of indefensible cruelty are finally being debated. There is a chance here for the State of Indiana to take a stance and lead the way on this extremely important issue.

Comment Received 11/30/2014 11:14:11 AM

Commenter Name Alexa

City London **County** Out of State **State** UK

E-Mail Address alexahelenrice@hotmail.com

Comments I think that this is an incredibly retrograde step given that otters have already been introduced once before because of mass hunting. It is not a food source and this simply encourages wearing fur.

Surely human beings can find something more positive on this earth to do.

Comment Received 11/30/2014 4:09:35 PM

Commenter Name Jared Brenner

City New York **County** Out of State **State** NY

E-Mail Address jgbrenner1@aol.com

Comments Indiana already exterminated its otter population once. Please don't make that mistake again.

Comment Received 11/30/2014 9:33:56 PM

Commenter Name victor szczechowski

City martinsville **County** MORGAN **State** in

E-Mail Address vic@alltrades.comcastbiz.net

Comments I agree with the a season on river otter in the state of Indiana. Wildlife needs to be managed scientifically and not through public opinion. We have state employed wildlife biologists for a reason. Scientific management of our resources is the course our state needs to maintain. Wildlife, like many other things, needs to be managed by professionals and not emotions. I applaud the efforts of the INDNR for recognizing the need for an otter season based on sound biological management. An otter season should be an indication, and looked at from all sides, as a good thing and as a huge success with our reintroduction efforts. Through sound, scientific management, our state can provide the proper balance to satisfy hunters, fishermen, outdoor enthusiasts, hikers, non-hunters, etc. But, I believe, the focus always needs to be scientific based and not public opinion. Thank you, Victor Szczechowski Martinsville, IN.

Comment Received 12/1/2014 9:47:47 AM

Commenter Name Jeff Valovich

City Chesterton **County** PORTER **State** In

E-Mail Address jtv2485@gmail.com

Comments I support the opening of a trapping season for river otters.....

Comment Received 12/1/2014 1:55:51 PM

Commenter Name Jason Combs

City Tell City **County** PERRY **State** Indiana

E-Mail Address jason_combs@hotmail.com

Comments I support the proposed amendment allowing .243 caliber centerfire rifles and larger to be legal equipment for deer hunting. I would like to see .223 and larger calibers to be legal equipment for deer hunting as well to allow lighter recoil calibers for youth hunters.

Comment Received 12/1/2014 3:34:26 PM

Commenter Name David Durcholz

City Velpen **County** PIKE **State** Indiana

E-Mail Address ddurcholz@fullnet.com

Comments I first would like to say how Impressive the work of Indiana's DNR is. I have personally seen otters in some of the smallest of streams. Seeing an otter is highly possible if a person is willing to venture a little. I would support a limited trapping season to start out with to see where things go from there. Thank You. Dave Durcholz

Comment Received 12/2/2014 6:45:31 AM

Commenter Name Leo Reed

City Lafayette **County** TIPPECANOE **State** IN

E-Mail Address reed364@gmail.com

Comments I'd like to urge DNR to allow the trapping of river otters only in those counties where it has been confirmed that otters are sufficiently established or have been reported as being nuisance wildlife.

Obviously, I don't have all the data DNR has collected, but from my kayaking around the state, it seems there are a number of counties that do not have large enough numbers to justify trapping (yet).

Comment Received 12/3/2014 3:27:49 PM

Commenter Name Kaleb Wagenbach

City Wolcott **County** WHITE **State** Indiana

E-Mail Address kjwagenbach@gmail.com

Comments Having a river otter season and the allowance of selling their hides is very acceptable.

Comment Received 12/3/2014 3:27:57 PM

Commenter Name Dan Shaver

City Columbus **County** BARTHOLOMEW **State** Indiana

E-Mail Address shaverforestry@yahoo.com

Comments Reintroducing river otters into Indiana was a great success. Establishing a trapping season is the next logical step in wise management of this species. I fully support the proposed rule change.

Comment Received 12/3/2014 3:29:53 PM

Commenter Name Gabriel Hartwig

City Lafayette **County** TIPPECANOE **State** Indiana

Organization (optional) IPCWD

E-Mail Address gabrielhartwig88@gmail.com

Comments It is in my personal opinion that if our state biologists and researchers have established that the current population of river otters in the state would merit such a season then so be it. Otters crossing over from larger bodies of water can cause considerable damage to fish ponds and we should have a means of control in place. Thank you for the opportunity to state my feeling and God bless.

Comment Received 12/3/2014 3:31:36 PM

Commenter Name Ted Butz

City Indianapolis **County** MARION **State** IN

E-Mail Address tedbutz@talktotucker.com

Comments I support the changes. I support the trapping of river otters.

Comment Received 12/3/2014 3:36:06 PM

Commenter Name Casey Rayls

City Rising Sun **County** OHIO **State** Duh....Indiana

E-Mail Address crayls@embarqmail.com

Comments The otter season is long past due. Why did it take nearly 20 yrs. to get a season ? Otters have been around for a long time here on the Ohio River. Ditto for bobcat. How long till a season on bobcats ? Guys are killing bobcats and sinking them in creeks....tired of catching them, waiting on C.O.s to come to acknowledge the release...who take their own sweet time...if they show up at all. The DNR is killing more bobcats and otters than trappers.....guys are tired of the b.s. that goes with accidental otter and bobcat catches and are simply dealing with the catches on their own. Put a season on BOTH and let us get on with it. The biologist know 1/10th of what actual in the trappers do in regards to animal populations. Sorry..but this is the truth.

Comment Received 12/3/2014 3:37:58 PM

Commenter Name Doug A Clipp

City Columbus **County** BARTHOLOMEW **State** Indiana

E-Mail Address daclipp@cunn.com

Comments I think a river otter season is very justified. I do almost all of my hunting along the east fork of the white river and on flatrock river in bartholomew county. I find countless numbers of flathead catfish heads, painted turtles and other

wildlife that they are eating on a daily basis. It is amazing of how large a catfish that they can kill and eat. The sign shows that without controlling their population they do pose a threat to our fishery in the river. I trap with friends who do a lot of beaver trapping. Every year I see more and more otters caught.

Comment Received 12/3/2014 3:41:54 PM

Commenter Name Elizabeth McWilliams

City Evansville **County** VANDERBURGH **State** Indiana

E-Mail Address mcwilliams84@wowway.com

Comments I think this is rushing the hunting of river otters. It wasn't that long ago they were endangered. Please protect this species.

Comment Received 12/3/2014 3:43:47 PM

Commenter Name Herb

City Bluffton **County** WELLS **State** Indiana

E-Mail Address herb.bergman@gmail.com

Comments I do not feel that the river otter population is abundant enough to constitute open trapping. Unless the Indiana Department of Natural Resources feels they made a mistake in reintroducing them to Indiana. If we want them here in Indiana, Do Not make it open! I have yet to see a river otter in the wild. I think it would be an awesome experience to have that opportunity someday. If you pass this, I will not have that opportunity.

Comment Received 12/3/2014 3:52:28 PM

Commenter Name KEN PORTER

City GROVERTOWN **County** STARKE **State** INDIANA

E-Mail Address porterbucks@hotmail.com

Comments yes to otter trapping

Comment Received 12/3/2014 3:52:34 PM

Commenter Name Kathy Jaworski

City Gary **County** LAKE **State** Indiana

E-Mail Address katjawor@att.net

Comments Don't allow trapping of river otters in Indiana. Since reintroduction this species still requires protection under the laws of the state. Some counties still do not even have a population yet. The otter population should be allowed to grow here. Not every species should be open for harvesting and the otter is amongst them. Indiana has a long sad history of killing the wildlife of the state to the point of total elimination. The reintroduction was a wonderful idea and their numbers should be allowed to grow to approximate pre-settlement. Save our otters, not kill them.

Comment Received 12/3/2014 3:54:08 PM

Commenter Name Tom Steinberger

City Logansport **County** CASS **State** Indiana

E-Mail Address steiny77@hotmail.com

Comments I DO SUPPORT HARVEST AND SALE OF RIVER OTTERS.

These animals are now plentiful and are doing serious damage to fish populations in private ponds anywhere near a major river. Plus they are a valuable fur that should be able to be sold.

Comment Received 12/3/2014 3:58:27 PM

Commenter Name Marc Andrews

City Warsaw **County** KOSCIUSKO **State** IN

E-Mail Address mandrews@warsaw.k12.in.us

Comments I think that the use of the proposed high powered rifles would be a positive addition to the deer hunting season.

Comment Received 12/3/2014 3:59:34 PM

Commenter Name John Kremp

City Jasper **County** DUBOIS **State** In

E-Mail Address jfk@kremp.net

Comments Please allow trapping of otter. They have become quite plentiful on my properties and have wiped out the fish and frogs in several of my ponds. They are a beautiful animal but population needs to be controlled.

Comment Received 12/3/2014 4:00:30 PM

Commenter Name Jason Massey

City Evansville **County** VANDERBURGH **State** Indiana

E-Mail Address JASON.E.MASSEY@GMAIL.COM

Comments I'd like to start my comment by stating that I'm not opposed to trapping or hunting as a general rule. With that said, however, I do not believe that the river otters should be trapped at this time. I hear they are abundant in our area but I've yet to see one. I'm an amateur wildlife photographer who spends a large amount of my free time out in the woods and nature preserves and I see evidence of otters but have yet to capture an image of one. Obviously this doesn't mean they aren't there but are they at the numbers necessary for trapping. What is the actual purpose of the proposed ruling? Economic? Are the river otters creating issues due to overpopulation in the same way as deer? I admit to not being privy to

the otter population numbers and possible issues. I'd assume these things have been fully investigated and the powers to be do not feel that this proposal will have a negative impact on the river otter population. Are there any studies for us to look at to confirm this information? Anyway, I strongly feel that the river otter population is not ready for trapping at this time. Thanks for reading!

Comment Received 12/3/2014 4:00:47 PM

Commenter Name Isaac Dorrel
City Brookville **County** FRANKLIN **State** IN
E-Mail Address isaacdorrel@gmail.com
Comments Allow river otter trapping.
Comment Received 12/3/2014 4:08:20 PM

Commenter Name Jordan Kramer
City Greensburg **County** DECATUR **State** Indiana
E-Mail Address kramer27@purdue.edu
Comments I support starting a trapping season for river otters.
Comment Received 12/3/2014 4:11:05 PM

Commenter Name Steve Burress
City Madison **County** JEFFERSON **State** INDIANA
E-Mail Address evetsss67@gmail.com
Comments Leave the river otters alone. Let them live.
Comment Received 12/3/2014 4:14:57 PM

Commenter Name Martin Ingram
City montpelier **County** BLACKFORD **State** Indiana
E-Mail Address martin@muncieaviation.com
Comments The River Otter has decimated the fish population of the Salamonie River and many local ponds in my area. I think it is a perfect idea to allow trapping them. I question the purpose of a limit on them.
Comment Received 12/3/2014 4:19:31 PM

Commenter Name Greg Cook
City butlerville **County** JENNINGS **State** IN
E-Mail Address gcook@seidata.com
Comments river otters are hurting fishing in a bad way. they come and stay at a pond till they hurt it and move to another. they get the big fish the worst. totally out of control. need season asap.
Comment Received 12/3/2014 4:19:55 PM

Commenter Name patrick
City monticello **County** CARROLL **State** in
Organization (optional) jones
E-Mail Address patrick.jones@trw.com
Comments I believe some provision needs to be in place to prevent harvest from lakes and reservoirs. I live on a local reservoir and it is common knowledge where several otter families live. It would be extremely easy to eradicate the entire otter family. The animals have become tolerant of humans and display little fear when confronted. They are enjoyed by all that live on the lake and it would only take one misguided individual to undo years of hard work that the DNR has accomplished. Thank you for your time.
Patrick Jones
Comment Received 12/3/2014 4:30:26 PM

Commenter Name Mike Coplen
City Logansport **County** CASS **State** Ind
E-Mail Address mcoplen@kewire.com
Comments I am for the trapping of the river otter, has been devastating fishiing in the river and private ponds.
Comment Received 12/3/2014 4:30:41 PM

Commenter Name Mike Coplen
City Logansport **County** CASS **State** Ind
E-Mail Address mcoplen@kewire.com
Comments I am for the trapping of the river otter, has been devastating fishiing in the river and private ponds.
Comment Received 12/3/2014 4:31:09 PM

Commenter Name Richard Mott
City Whitestown **County** BOONE **State** IN
E-Mail Address debbiemott@earthlink.net
Comments I am in favor of trapping or even otherwise taking River Otter. The River Otters do damage to healthy fisheries on rivers and lakes.
Comment Received 12/3/2014 4:32:54 PM

<p>Commenter Name Matthew Coe City Noblesville County HAMILTON State Indiana E-Mail Address mcoe9@hotmail.com Comments The Indiana River Otter trapping should not be allowed for the 2015 season. The re-introduction and overall health should be allowed to become more established prior to future trapping legislation. The addition of the river otter into the Indiana river system has been a success and for continued success should be monitored and distributed more widely throughout the entire state prior to trapping. Comment Received 12/3/2014 4:34:16 PM</p>
<p>Commenter Name Andrew Arney City Markle County WELLS State Indiana E-Mail Address andrew@andrewarney.com Comments Trapping season for river otters is a good start. I like seeing them in the wild but I also would like to see pond owners and people with chickens, ducks, etc have some sort of defense against the destruction and predation of the otter. As cool or neat as they may be they can wipe out the fish in a pond in short order and this is hardly fair for the owner. Comment Received 12/3/2014 4:41:04 PM</p>
<p>Commenter Name Scott Thompson DVM City Newburgh County WARRICK State In E-Mail Address bbbands@sbcglobal.net Comments I am currently apposed to changing the current rules. Nuisance trapping is needed but I see no other reason to trap them. Let them continue to increase their population for a few more years. Comment Received 12/3/2014 4:42:14 PM</p>
<p>Commenter Name James Hering City Plainfield County HENDRICKS State Indiana E-Mail Address jkhering@bellsouth.net Comments Disagree with the sale of the River Otter fur and carcass parts due to the limited river otters Comment Received 12/3/2014 4:42:29 PM</p>
<p>Commenter Name Michael L. Cross City Elkhart County ELKHART State Indiana E-Mail Address mcrosshart@frontier.com Comments In the last week as I was checking in for put and take Pheasant I have witnessed 3 otter trapped unintentionally, then brought to the check stations to be recorded. As a result of this, I surveyed several trappers in the area who said they have seen numerous otters and have also caught them. If the population warrants trapping as is so indicated by the #'s being seen then lets make it legal and not waste this resource. Comment Received 12/3/2014 4:45:52 PM</p>
<p>Commenter Name Reverend Peyton City Nashville County BROWN State Indiana E-Mail Address revpeyton@gmail.com Comments I think we should wait a couple of years at least before we open up trapping of otters. They are only recently coming back. I gave been trapping my whole life, but I don't think the otters are ready in Indiana. Comment Received 12/3/2014 4:50:44 PM</p>
<p>Commenter Name Wallace Morrison City Otterbein County WARREN State IN E-Mail Address wbm@purdue.edu Comments I do not support trapping River Otters. I worked with the DNR to reintroduce river otters into Indiana as a veterinarian at Purdue University. I realize that they are becoming established, but I cannot support a resumption of trapping at this time. Comment Received 12/3/2014 4:54:52 PM</p>
<p>Commenter Name Larry Boezeman City Demotte County JASPER State in E-Mail Address larry@netnitco.net Comments The river otter season has been needed for some time. They can ruin a private fish pond, our muskrat populations in river otter areas are in a steady decline, and it is difficult to operate a beaver or raccoon trapline without catching otters. It is wonderful to see river otters in our eco- system again, but like all of our natural resources, they must be managed. Comment Received 12/3/2014 5:04:45 PM</p>
<p>Commenter Name WADE THOMAS City MEMPHIS County CLARK State INDIANA E-Mail Address SPEEDYMT66@HOTMAIL.COM</p>

Comments I agree to allow the buying and sale of animals taken legally.

Comment Received 12/3/2014 5:05:23 PM

Commenter Name Adam Couch

City Huntington **County** HUNTINGTON **State** IN

E-Mail Address adamcouch@hotmail.com

Comments I have lived and trapped in Huntington county for around twenty years.

The area I trap has had river otters in it for several years. Fortunately I have avoided them up until last year. The fatal catch was handled well by the DNR, in fact they took it better than I did. I returned to the area again this year after the farmer ask to remove the muskrats he had destroying his ditch banks only to find even more otter sign than before. I have lightly trapped the area only to keep others who don't care to avoid the otters out of it. Giving a trapper at least the ability to take a couple otters gives us a chance to take our target animals much faster without the fear of wasting an animal that is non target. I personally will not target the animal yet but be relieved it's pelt will be utilized if caught. I would like to thank the NRC for asking and taking time to read our comments and also the DNR for being understanding of accidental catches. Thank you for your time and effort.

Adam Couch

Comment Received 12/3/2014 5:08:35 PM

Commenter Name Mullendore, Bryan, L

City Monticello **County** WHITE **State** IN

Organization (optional) Trapping

E-Mail Address bryanlm1@hotmail.com

Comments I live on lake Shafer and fish and trap the Tippecanoe and Wabash river year round. I also run a trap line from my house to Logansport, IN. My family and i watch the river otter from our dinning room window while we eat meals and lounge about. Along with be able to tell you they are all over the area. i could take you to several locations in which i could at least show you sign or eveidence of them being there. i believe they have established a population lvi that needs to be managed. i also believe this can be done by allowing them to be trapped. i hope that only facts will be considered to sway this decsision in one way or the other and not uneducated Anti hunting/trapping propaganda or threats!

Comment Received 12/3/2014 5:08:59 PM

Commenter Name Samuel St.Clair

City Larwill **County** WHITLEY **State** In

E-Mail Address sstclair52@gmail.com

Comments I agree with establishing a trapping season for Otters since there population has increased to nuisance levels in some areas

Comment Received 12/3/2014 5:12:59 PM

Commenter Name Mitch Lyons

City Valparaiso **County** PORTER **State** Indiana

E-Mail Address mitch.lisa@comcast.net

Comments I do not agree with the river otter trapping. I believe that the two limit would be abused.

Comment Received 12/3/2014 5:58:06 PM

Commenter Name Wayne Langman

City Terre Haute **County** VIGO **State** Indiana

E-Mail Address sgtwal@aol.com

Comments I fully support this change as it will reduce the waste of squirrel skins and the waste of otters taken by accident by trappers.

Comment Received 12/3/2014 6:03:30 PM

Commenter Name Jon Oswald

City Bremen **County** MARSHALL **State** Indiana

E-Mail Address jgoswald@msn.com

Comments Strongly oppose this rule change.

Comment Received 12/3/2014 6:14:02 PM

Commenter Name steve ehinger

City spencerville **County** DEKALB **State** in

E-Mail Address ebethsteve@att.net

Comments I am in favor of this proposed rule; considering the 2/season limit and statewide quota.

Comment Received 12/3/2014 7:03:50 PM

<p>Commenter Name Ian Brown City Chesterton County PORTER State In E-Mail Address brownnla@frontier.com Comments I support the proposed change to allow trapping of river otters. I spend a lot of time hunting in Jasper County and have seen a large number of river otters in recent years and believe that with adequate oversight trapping can be allowed and a healthy population maintained. Comment Received 12/3/2014 7:11:03 PM</p>
<p>Commenter Name Dennis City Mooresville County MORGAN State Indiana E-Mail Address den_us77@yahoo.com Comments To be honest I'm not up to date on the river otter numbers to have a say on it. But I think it's a great idea to be able to use or sale animal fur, antlers, bones, feathers, ect. To use or sale the left over parts so all the animal is used. Thank you Comment Received 12/3/2014 7:41:32 PM</p>
<p>Commenter Name Scot H Dahms City Peru County MIAMI State Indiana E-Mail Address ranger1971@comcast.net Comments I am fully in favor of an otter trapping season. One thing that I would like to see is just a state quota with no limit per season per trapper. I live in an area with many otter. I trap several ponds and I receive several complaints from landowners about otter. By only allowing two per trapper per year, I will not to be able to help each landowner with their otter problem. Also, I think that having to turn in the ones caught after the trapper reaches their limit is a loss of revenue for the trapper and furbuyer. Otters will be worth the most of all furbearers and the trappers should be able to retain all caught up to the state quota is met. Comment Received 12/3/2014 7:54:40 PM</p>
<p>Commenter Name Paul Young City Salem County WASHINGTON State Indiana E-Mail Address jacfac@blueriver.net Comments I totally agree we should be able to use a high power rifle for deer hunting It only makes since Comment Received 12/3/2014 7:54:51 PM</p>
<p>Commenter Name Kevin Merritt City Terre Haute County VIGO State Indiana E-Mail Address Kmerritt1974@gmail.com Comments I don't believe at this time we should pass the ruling at this time because there numbers need ti grow and this would hurt that growth ! My vote would be NO! Comment Received 12/3/2014 8:00:57 PM</p>
<p>Commenter Name John Gallman City Bloomington County MONROE State Indiana E-Mail Address J.gallman@hotmail.com Comments Jeez, seems like a year or two ago we were overjoyed to have re-establishshed otters. Let's leave them alone. Comment Received 12/3/2014 8:13:12 PM</p>
<p>Commenter Name david okeley City wanatah County LAPORTE State indiana E-Mail Address cycledave@frontier.com Comments I believe as a lifelong Indiana hunter and license purchaser that it is too soon for trapping of the river otter.I have not even had the opportunity to even see one in the wild yet. Comment Received 12/3/2014 8:45:18 PM</p>
<p>Commenter Name John Fithian City Hazleton County GIBSON State Indiana E-Mail Address deadlevel@hotsheet.com Comments Yes we need a river otter season my neighbor has them in his pond eating all of his fish an it is miles from any river just about any body of water with fish in it has them. We also need a bobcat season to, see there tracks everywhere. Comment Received 12/3/2014 8:51:37 PM</p>
<p>Commenter Name Gregory L. Corpe City South Bend County ST.JOSEPH State Indiana E-Mail Address sbgreg@comcast.net Comments yes. lets have an otter season and sell squirrel hides Comment Received 12/3/2014 9:01:39 PM</p>
<p>Commenter Name Steve Jones</p>

<p>City Rockville County PARKE State IN E-Mail Address in.jones2438@sbcglobal.net Comments I think it is too early to start an Otter trapping season. I do not think their numbers indicate that a trapping season is needed. Comment Received 12/3/2014 9:02:07 PM</p>
<p>Commenter Name Kris Geyer City huntington County HUNTINGTON State Indiana E-Mail Address hooknshoot@att.net Comments I support this rule change. Comment Received 12/3/2014 9:20:38 PM</p>
<p>Commenter Name Mike Kellems City Birdseye County DUBOIS State IN Organization (optional) Mr. E-Mail Address m_kellems@yahoo.com Comments If rule passes to allow high powered rifles to take deer in Indiana, Would like to see you make the smallest caliber of 243 cal. This is the smallest that Kentucky will allow. The guns we have and can use in Ky. will be good if we can use them in our home state. Would like to see Ind. dept. work more closely with Ky DNR Make things work together , Please! Comment Received 12/3/2014 9:38:27 PM</p>
<p>Commenter Name Eric Babcock City Pleasant Lake County STEUBEN State in E-Mail Address blues_bro77@yahoo.com Comments Hi I am opposed on the rule change to trap river otters. I've lived in Steuben co for 45 years and have never seen an otter. I used to donate to protect them and now we want to trap them? What area of Indiana is over run with them? Thanks Eric Comment Received 12/3/2014 9:47:59 PM</p>
<p>Commenter Name Daniel Vogel City North Vernon County JENNINGS State Indiana E-Mail Address dan_2012_@hotmail.com Comments I agree that that the taking of river otters shall now be legal. This past summer I have seen more of them than any other year. I witnessed two eating fish out of my pond I just stocked last spring. They are starting to become a problem around here. I almost always see them while kayaking the Vernon fork of the Muscatatuck River. Three of them cleaned out my fishing spot at six mile creek also. If there was a trapping season for them, I'd for sure buy a trapping license. Comment Received 12/3/2014 10:18:39 PM</p>
<p>Commenter Name William Meer City Batesville County RIPLEY State Indiana E-Mail Address wpmeer@yahoo.com Comments the sale of squirrel hides and any portion of a river otters should be legal..I am in favor of establish a trapping season for river otters Comment Received 12/3/2014 10:18:51 PM</p>
<p>Commenter Name Gary Gillette City Dunkirk County JAY State Indiana E-Mail Address flyngeagle47@gmail.com Comments I was not aware that a person could sell squirrel tails. However, I think being able to sell all of the hide would be a good idea. Comment Received 12/3/2014 10:24:07 PM</p>
<p>Commenter Name Randy Rush City Macy County FULTON State In E-Mail Address rl007rush@yahoo.com Comments Yes...please organize a trapping and/or hunting season for otters. They are getting out of hand. What is it?...something like 72 counties out of Indiana's 92 are having problems with otters. I believe that statistic is from you. I have friends that have private ponds with otter problems too. I never want to see any animal population decimated but I do want to see the otters under control. I live on Nyona Lake seven months out of the year. I have pictures of eight otters swimming in a group on that lake. I have lived at the lake for several years. Over the years I have noticed the fishing has gone down hill. Not sure the otters are the total of the problem but they are in the equation. What percent do otters eat in their body weight on a daily basis? Whatever it is can be times eight otters. Nyona is approximately 110 acres per your data. Not a good ratio of acreage vs. fish to otters. Thank you. Randy Rush</p>

Comment Received 12/4/2014 2:39:04 AM
Commenter Name Patrick Jones City Evanston County SPENCER State Indiana E-Mail Address pfjones@psci.net Comments I think the high power rifle rule is excellent. The best thing since the invention of the flush toilet! I think it is common since and about time. Comment Received 12/4/2014 5:35:02 AM
Commenter Name Aleisa Hunter City New Palestine County HANCOCK State Indiana E-Mail Address adhunter@stvincent.org Comments I totally disagree with creating a trapping season for the river otters unless their population has increased to a point that they are causing problems. We have worked so hard to get them established in Indiana again--now you want to trap and kill them? Comment Received 12/4/2014 6:04:47 AM
Commenter Name Jerry Stjohn City North Vernon County JENNINGS State IN E-Mail Address jstjohn11@hotmail.com Comments I believe that a trapping season is over due.I am very much in favor of this. Comment Received 12/4/2014 6:21:57 AM
Commenter Name Chris City Kokomo County HOWARD State IN E-Mail Address cizooky@yahoo.com Comments We hardly ever even see river otter and they are making a come back. Lets not destroy due to legal trapping. Comment Received 12/4/2014 6:51:04 AM
Commenter Name Mike Collins City Portland County JAY State IN E-Mail Address collinsme@purdue.edu Comments Very much needed in my area. Should stop the loss of a valuable resource. Comment Received 12/4/2014 7:14:31 AM
Commenter Name Jeff Walters Sr. City Logansport County CASS State IN E-Mail Address jeffwalt77@gmail.com Comments I am happy to see the river otter thriving in our state, however, I think the numbers are such, and the negative affect they have on fishing and farm ponds, warrants a structured trapping season. Comment Received 12/4/2014 7:43:14 AM
Commenter Name Shannon Mattix City Monticello County WHITE State Indiana E-Mail Address shannon@mattixfinancial.comcastbiz.net Comments Please allow trapping of the otter! They are out of control in numerous areas on the Tippecanoe River and destroy farm ponds and numerous other bodies! Comment Received 12/4/2014 8:03:09 AM
Commenter Name Amy Hime City Portland County JAY State Indiana E-Mail Address amyhime1967@gmail.com Comments I believe it to be a good decision in allowing otter to be trapped. I trap with a couple of friends and last year we accidentally trapped 2. This year we are almost nervous about setting out our raccoon traps because we don't want the accidental catch. I also have a few friends in this county that have stated that the otter are tearing up their ponds. We had the game warden pick them up last year (Dewayne Ford). They are definitely becoming a substantial number. Again, we appreciate the change in the law. Comment Received 12/4/2014 8:13:46 AM
Commenter Name James Ransbottom City Fort Wayne County ALLEN State INDIANA E-Mail Address j.ransbottom@comcast.net Comments Absolutely do NOT allow senseless killing of such a beautiful animal. The river otter is up there with dolphins and whales in terms of aesthetic beauty. I don't want MY state to allow this type of lunacy. Comment Received 12/4/2014 8:36:54 AM
Commenter Name Jordan Howell City Argos County MARSHALL State IN E-Mail Address sharpbroadheads@hotmail.com

Comments I am in favor of an otter trapping season. It id's good to see the population doing so well; however the numbers in my area are more than high enough to support a related harvest. In addition, otters have become somewhat of a problem in some areas by decimating fish populations in small ponds. Trapping would be a good way to solve this problem.

Comment Received 12/4/2014 8:37:17 AM

Commenter Name j.johnson

City columbus **County** BARTHOLOMEW **State** indiana

E-Mail Address jjohnson5184@comcast.net

Comments Comment against sale of squirrel hides. Instead, comment to increase the total bag limit per season of squirrels to 20.

Comment Received 12/4/2014 8:39:01 AM

Commenter Name Kent Wamsley

City Winamac **County** PULASKI **State** Indiana

E-Mail Address kentwamsley@yahoo.com

Comments I am in favor of a trapping season for river otter.

I believe their prolific reproduction and spread was more than anticipated and the population needs to be controlled. However I think that trapping should only be for 3 years and then 2 years (or some schedule similar) no trapping to better balance the population

Comment Received 12/4/2014 8:41:27 AM

Commenter Name JAMES MASTIN

City New Castle **County** HENRY **State** Indiana

E-Mail Address jmsndglm@gmail.com

Comments I agree Looks like a fare rule change

Comment Received 12/4/2014 8:53:14 AM

Commenter Name Rod Hare

City Harlan **County** ALLEN **State** Indiana

E-Mail Address rdhare1999@yahoo.com

Comments I do like the proposed changes to firearms equipment during deer season. I like the fact we could use classic deer cartridges such as .30-30, .270Win, .30-06, etc. I would caution against allowing the use of extreme range rounds such as .50BMG, .338Lapau, etc.

Comment Received 12/4/2014 8:57:11 AM

Commenter Name courtney

City decatur **County** ADAMS **State** Indiana

E-Mail Address courtneyhurst86@gmail.com

Comments This is ridiculous . Hunt an animal that is overpopulated or that can be used for more than fur.

Comment Received 12/4/2014 8:58:45 AM

Commenter Name Mike Hausz

City Lanesville **County** HARRISON **State** Indiana

E-Mail Address mvhausz@frontier.com

Comments Need a season for otter. They need to be managed to control population.

Comment Received 12/4/2014 9:50:52 AM

Commenter Name Ed Scholle

City Milan **County** RIPLEY **State** Indiana

E-Mail Address blackbearin@gmail.com

Comments I don't agree with trapping river otters. There numbers are coming back after being re-introduced, but I don't feel they are strong enough.

Comment Received 12/4/2014 10:03:47 AM

Commenter Name Lynn Shaw

City Nashville **County** BROWN **State** INDIANA

E-Mail Address ljshaw3045@gmail.com

Comments I agree that RIVER OTTERS are at a sustanable level, such that trapping them would be a benefit to both trappers and the population abundance we are now experiencing.--I was at the first release down at Muscatatuk and watched a new rebirth of this species. Trapping is the right answer.---Thank You---Lynn Shaw

Comment Received 12/4/2014 10:29:15 AM

Commenter Name Mark Waltz

City Franklin **County** JOHNSON **State** Indiana

Organization (optional) Mr.

E-Mail Address mapawaltz@embarqmail.com

Comments Allow the sale of squirrels but leave the river otter alone

Comment Received 12/4/2014 10:59:46 AM

<p>Commenter Name Aaron Payne City Chandler County WARRICK State Indiana E-Mail Address apayne8814@yahoo.com Comments I want to argue that these laws need to pass!!!! People are trying to argue that the deer population is down. Well if its down why are they still hunting? they shouldn't be if that was the case but it aint. People are scared of change, they didn't like the crossbow idea they didn't like the low caliber rifle idea but it turned out ok.then they want to argue how far a high power rifle will shoot . I can shoot the 44 mag rifle with the hornady 300 grain xtp up to 300 yards I can a muzzle loader up to 500 yards with hot loads.I can shoot a 20 gauge shotgun up to 250 yards I mean come people their just scared of change!!!!!! so I say pass the bill!!!!!! Comment Received 12/4/2014 11:12:41 AM</p>
<p>Commenter Name Bill Smith City Pekin County WASHINGTON State Indiana Organization (optional) home E-Mail Address bjsmith1@frontier.com Comments Fully support a trapping season for otters. Also support the use of high powered rifles during the deer season. Comment Received 12/4/2014 11:13:27 AM</p>
<p>Commenter Name Charles E. Sims City Indianapolis County MARION State IN E-Mail Address csims@firstgroupengineering.com Comments I like the idea of allowing rifles. I have been using a pistol in 35 rem for years using a steady rest and wondered why the same cartridge was not allowed in a long gun, which would be more accurate to shoot allowing more accurate shot placement thus cleaner kills. I agree with the min. size caliber for rifles but think there should also be a maximum limit for energy levels say for 30-30. or 35 rem (lower velocity) cartridges. This would be safer while allowing many of the magnum rifle rounds would be ridiculous on deer sized game. I think it wise when allowing a new weapon season to be a bit conservative and begin with some restrictions, say cartridges with a maximum muzzle velocity of 3000 to 3300. This may seem complicated but you could simply provide a ballistic chart showing cartridges allowed including bullet weights allowed. I realize there are some who would still push the limits with reloads but most people would follow the chart. Comment Received 12/4/2014 11:17:43 AM</p>
<p>Commenter Name jeff gillenwater City kendallville County NOBLE State indiana E-Mail Address jgillenwater@lagrangesd.com Comments I vote "no" on the proposed season for trapping river otters. These creatures were just re-introduced in our area and i dont see overpopulation as a problem. They aren't considered a nuisance animal to my knowledge. My parents live on a local lake and there is a family of three otters living here. Our family has lived here for over fifty years and have never had the enjoyment of watching creatures like these frolic and play at the lake. I believe if a trapping season is enacted, these creatures will probably never be seen in this body of water again. I am not however,biased against trapping. I have held an annual Indiana trapping license for 30 years and enjoy it very much. I just dont see the otter population as so large it needs to be controlled somewhat with a trapping season. Thank you.. Comment Received 12/4/2014 11:22:10 AM</p>
<p>Commenter Name Richard Holt City Williams County LAWRENCE State Indiana E-Mail Address rnholt@rtccom.net Comments Leave the otters alone. They should not be trapped, hunted, or their fur sold. Just not enough of them around. Trap only to relocate. Comment Received 12/4/2014 11:34:25 AM</p>
<p>Commenter Name BRIAN INGMNIRE City Greensburg County DECATUR State IN E-Mail Address BEEYEFARMS@GMAIL.COM Comments I have no problem with the proposed allowance of the sale of squirrel hides, however, I am vehemently opposed to any reduction in the protective status of river otters. It is still to early in their recovery period to entertain any changes. Comment Received 12/4/2014 11:41:05 AM</p>
<p>Commenter Name John McManus City walton County CASS State indiana E-Mail Address gusndaisy@mcremc.net Comments River otters have destroyed the fish populations in two private ponds near my home that I fish. Location is 3-5 miles south of Wabash river and Lewisburg on or near Little Deer Creek. Both land owners have completely lost their fish populations and the otters and producing at a high rate. Please open trapping/hunting season on river otters . we have no more fish to catch. Comment Received 12/4/2014 12:13:04 PM</p>
<p>Commenter Name Greg Baxter</p>

<p>City Columbus County BARTHOLOMEW State Indiana E-Mail Address Phatbaxterin@aol.com Comments I think the river otters are well established and it is time for a takeing season on then they are no longer endangered Comment Received 12/4/2014 12:23:15 PM</p>
<p>Commenter Name Todd Jay Boyle City McCordsville County HANCOCK State INDIANA E-Mail Address tboyle@fcrwd.com Comments I oppose the river otter trapping season, and I don't think it's a good idea. Living in Indiana my whole life and being an avid outdoorsman, I have never seen one. I believe they are too scarce to be trapped and hunted. Comment Received 12/4/2014 12:30:01 PM</p>
<p>Commenter Name Kevin cripe City delphi County CARROLL State In E-Mail Address kbcripe61@gmail.com Comments Yes there should b a trapping season Comment Received 12/4/2014 1:09:57 PM</p>
<p>Commenter Name thomas r hodnett City columbus County BARTHOLOMEW State indiana E-Mail Address tom.hodnett225@gmail.com Comments i'm in favor of trapping them with a limit of 10 per season. Comment Received 12/4/2014 1:29:48 PM</p>
<p>Commenter Name Robert Harrison City Milltown County CRAWFORD State Indiana E-Mail Address mountain_bob@hotmail.com Comments I think that trapping river otter and the sale of squirrel hides should be approved Comment Received 12/4/2014 3:12:45 PM</p>
<p>Commenter Name Kyle Perdue City Andrews County HUNTINGTON State IN E-Mail Address kyleperdue@yahoo.com Comments I am against the proposed use of rifles. There are to many people who shouldn't have a rifle in their hands while deer hunting. Im afraid of how many people or things will be hit by stray bullets because they think they can shoot 600yds at a deer without having a good scope or even sighting it in for a long distance. You will have so many people start deer hunting because they can use a rifle. most of northern Indiana is flat a small sections of woods. I would be afraid of walking out of the woods and have people shooting across the field at a deer and im in the way. We have enough shotguns and muzzleloader that can shoot 200yds and the .358,.357 and others that can shoot 400yds. Theres too many people who don't understand rifles and the ballistics of them. The deer herd will decrease and poaching will increase because it will be ok to have a rifle with you all the time. People will just drive around looking for deer in the field and start shooting. It already happens now and will get worst! What we have is fine. I didn't like the cross bow because it takes the challenge out of it and increased the hunters in bow season. I say NO to rifles! I don't want people who know nothing on how do use one and ballistics to be close to me. Theres enough idiots out there now poaching and just shooting at whatever and they don't care...we don't need anymore. Thanks Kyle Perdue Comment Received 12/4/2014 4:12:10 PM</p>
<p>Commenter Name Tom Bowman City Pendleton County MADISON State Indiana E-Mail Address thomas.bowman@xyleminc.com Comments River Otters distribution and numbers are well above sustainable levels in Indiana. I believe they should be harvested for their fur. I would be in favor of this rule change that would allow that. Comment Received 12/4/2014 5:25:40 PM</p>
<p>Commenter Name Aram Batchelor City Logansport County CASS State IN E-Mail Address aram_batchelor@hotmail.com Comments I feel that otters should be legal to trap. My neighbor and I both have ponds and we have witnessed many otters in and out of our ponds.. We have bought a lot of fish and nowhave very little Thank You. Comment Received 12/4/2014 6:05:40 PM</p>
<p>Commenter Name Aram Batchelor City Logansport County CASS State IN E-Mail Address aram_batchelor@hotmail.com Comments I feel that otters should be legal to trap. My neighbor and I both have ponds and we have witnessed many otters in and out of our ponds.. We have bought a lot of fish and nowhave very little Thank You. Comment Received 12/4/2014 6:07:30 PM</p>

<p>Commenter Name Paul Gilb City Aurora County OHIO State Ind E-Mail Address hunter54@embarqmail.com Comments The Proposed Rifle law is obsurd. We here in indiana have been able to successfully Kill dear without these dangerous weapons. A few years ago I petitioned the state to restrict the amount of shells that may be in the Gun no matter what the kind. Now we arm the stupid people with multi shooting guns with riffle bullets so they can not only kill more than one dear an ever how many hunters the can wound or also kill. I am a firm believer that if you can't harvest your deer with 1-2 shots take Two and think about what you just did before shooting another.. I personally witnessed a hunter shooting a hand gun shooting at a heard of deer. Whoops. sorry about the hunter that could have also seen the same deer. No to rifles! let them get a good muzzle loader and give them one shot. They will learn to make it good. 2 shot magazines are a must. To strecht it maybe 3. Duck hunters do it. Comment Received 12/4/2014 7:49:54 PM</p>
<p>Commenter Name donna marshall City monticello County CARROLL State indiana Organization (optional) jtcc E-Mail Address donna7332@comcast.net Comments This should not be allowed. One otter per person or family if all trap per season. Sever penitalies if more are taken. Stricter laws also to enforce this. Comment Received 12/4/2014 8:45:34 PM</p>
<p>Commenter Name Abe Bear City Madison County JEFFERSON State IN E-Mail Address abraham.bear@yahoo.com Comments I support the trapping season for otters. They seem numerous in the area around Big Oaks NWR. The otters have altered the population dynamics of both lentic and lotic systems in the area. Comment Received 12/4/2014 8:53:22 PM</p>
<p>Commenter Name Cole Chandler City Fairmount County GRANT State Indiana E-Mail Address cchandler1622@gmail.com Comments I live on the Mississinewa River on Highway 26. The river, my swamp, and everyone I talk to that owns a body of water complains that they are infested with river otters. I personally have watched up to 10 at a time work my swamp and eat fish. They are neat animals, but it was a big mistake to introduce them into Indiana. Its not like northern states that have miles and miles of bodies of water. This species is a nuisance in Indiana. Many people have spent large amounts of money to stock their lakes with fish so that they can pleasure fish and otters are going in there and cleaning them out in no time. From what I see and what everyone else from Upland to Kokomo to Logansport is saying this species population is growing out of control very quickly. Everyone that I talk to about the proposed rule change is in complete disbelief that there is going to be a bag limit of ONLY 2. It needs to be more like 10. With a limit of 2 the population will continue to grow out of control and all of our small bodies of water will not be worth fishing. I have not heard 1 person say that they are happy that we have river otters. It was a good thought, but it is not working out the way it was envisioned. Nobody wants them here, except for the people who don't have to deal with all of the destruction and have no idea how bad they really are. Its like when you see a cute puppy at the pet store and you think its a good idea to get it until you get it home and it destroys your house. Comment Received 12/4/2014 8:53:28 PM</p>
<p>Commenter Name Judith worthington City angola County STEUBEN State Indiana Organization (optional) Na E-Mail Address judithworthington@aol.com Comments I have only been hunting deer in Indian for two year now. I am against this proposal to allow the use of high power rifles Indiana. It would be totally unsafe for the hunters as well as the general public. Comment Received 12/4/2014 9:26:08 PM</p>
<p>Commenter Name Jim Purvis City Tipton County TIPTON State Indiana E-Mail Address jpurvis317@tds.net Comments I do not think it is appropriate to trap the river otter. What are the possible benefits compared to the negatives. I understand that the otter population is stable, however, I do not understand the emphasis on harvesting these animals. Comment Received 12/4/2014 10:04:37 PM</p>
<p>Commenter Name John Kendall City Warsaw County KOSCIUSKO State Indiana Organization (optional) Indiana Audubon, NIMBA, NRA E-Mail Address jeffro595@yahoo.com Comments What is the benefit to hoosiers of selling river otter parts? Why must hunting and trapping follow any and every species possible? The otters are not game animals. We spent all this money to re populate them just to have them hunted? There are more hoosiers wanting to see an Indiana otter in the wild</p>

than wanting to trap or shoot them. This is a societal change. Next, we will be hunting sandhill cranes. Why must we continue to cater to hunters only? The world has changed and there are more people enjoying wildlife that isn't being harassed and trapped and shot at.

Comment Received 12/4/2014 10:32:31 PM

Commenter Name Jerome Applegate

City Tell City **County** PERRY **State** In.

E-Mail Address jerrypplgt@yahoo.com

Comments I think there should be a trapping season on otter with a small bag limit

Comment Received 12/4/2014 10:51:19 PM

Commenter Name Justin Hardy

City Paoli **County** ORANGE **State** indiana

E-Mail Address massy1533@yahoo.com

Comments I think this proposed rule of the trapping of river otters has been well researched. Allowing licensed trappers to harvest an annual bag limit of 2 will help control the population within areas. I live on the Patoka river and have experienced otters frequenting my pond as many as 3 at a time several times throughout this year. As stated in the proposed rule I think this will help determine how the population has rebounded in the state.

Comment Received 12/5/2014 7:56:16 AM

Commenter Name Greg schepman

City Crothersville **County** JENNINGS **State** Indiana

E-Mail Address gschepman@icloud.com

Comments I see otters more than squirrels. I don't know if otters r the reason or not but I've been setting lines in the river since I was a kid and u can't hardly catch a catfish in the river any more if the state is going to release animals they r going to have to be willing to let someone control the population at some point or not turn anything else loose in indiana

Comment Received 12/5/2014 8:00:45 AM

Commenter Name greg williamson

City newharmony **County** POSEY **State** in.

E-Mail Address gregpwill59@gmail.com

Comments I live on the banks of the wall ash river.the otter population is doing well here.I see them on occasion as well as their tracks on the sand bars my granddaughter and I frequent.I also known of one net fisherman that caught and drowned 7 otters.yes 7.yet another reason to stop the over fishing of this river.we are missing out on a tremendous opportunity to create a fabulous fishing opportunity for the people of our state.this river is capable of producing many trophy fish.aswell as boosting the otter population .money from fishing and trapping license fees . potential guide services and tours to have the chance to see otters and eagles that live right in front yard.take the step in the right direction and let us trap the otters and restrict the commercial fishing or better eliminate it all together .I m not alone in this many like minded people in this region . I know of one commercial fisherman how has stopped fishing with net's he sees the wrong they do to many of our rivers inhabitants .

Sincerely Greg Williamson

Comment Received 12/5/2014 9:19:53 AM

Commenter Name greg williamson

City newharmony **County** POSEY **State** in.

E-Mail Address gregpwill59@gmail.com

Comments I live on the banks of the wall ash river.the otter population is doing well here.I see them on occasion as well as their tracks on the sand bars my granddaughter and I frequent.I also known of one net fisherman that caught and drowned 7 otters.yes 7.yet another reason to stop the over fishing of this river.we are missing out on a tremendous opportunity to create a fabulous fishing opportunity for the people of our state.this river is capable of producing many trophy fish.aswell as boosting the otter population .money from fishing and trapping license fees . potential guide services and tours to have the chance to see otters and eagles that live right in front yard.take the step in the right direction and let us trap the otters and restrict the commercial fishing or better eliminate it all together .I m not alone in this many like minded people in this region . I know of one commercial fisherman how has stopped fishing with net's he sees the wrong they do to many of our rivers inhabitants .

Sincerely Greg Williamson

Comment Received 12/5/2014 9:22:01 AM

Commenter Name greg williamson

City newharmony **County** POSEY **State** in.

E-Mail Address gregpwill59@gmail.com

Comments I live on the banks of the wall ash river.the otter population is doing well here.I see them on occasion as well as their tracks on the sand bars my granddaughter and I frequent.I also known of one net fisherman that caught and drowned 7 otters.yes 7.yet another reason to stop the over fishing of this river.we are missing out on a tremendous opportunity to create a fabulous fishing opportunity for the people of our state.this river is capable of producing many trophy fish.aswell as boosting the otter population .money from fishing and trapping license fees . potential guide services and tours to have the

chance to see otters and eagles that live right in front yard. take the step in the right direction and let us trap the otters and restrict the commercial fishing or better eliminate it all together. I am not alone in this many like minded people in this region. I know of one commercial fisherman how has stopped fishing with net's he sees the wrong they do to many of our rivers inhabitants.

Sincerely Greg Williamson

Comment Received 12/5/2014 9:23:03 AM

Commenter Name William E. Deeter

City Plymouth **County** MARSHALL **State** Indiana

Organization (optional) Indiana citizen/Taxpayer

E-Mail Address billandsaradeeter@embarqmail.com

Comments I personally think that removing protections of the river otter in the State of Indiana is a terrible idea. These animals were trapped and hunted to extinction in this state in the not so distant past. I was so glad to see the restoration of the species by reintroduction years ago. But now, you see fit to make them available for exploitation once again. And for what, additional revenue for the State coffers through licenses, permits, etc.! I live in this State and own property containing habitat that I enhance for wildlife to give it a chance to have places to find cover, raise their young, find food and basically live. Hell, I haven't even seen a river otter in Indiana yet and now you want to start the slaughter all over again. Is this august board of individuals so jaded that they don't understand the reasons for protections of wildlife? Sure, I have no problem with hunting seasons for the whitetail deer as they have over-populated the State and are consuming our native tree species as seedlings to the point that reforestation is threatened. But, I and many others in this State want the opportunity to see otters, badgers, bobcats and weasels from time to time and know that they are part of the web of wildlife in our State and not just a commodity to exploit for the sake of additional State revenues. I know you will tell me we have good science to back up your proposition to have a "limited" trapping season for otters. I would say to your highly credentialed board to think back to a time that they made the decision to enter the sciences, politics and law. Why did you do it? The answer should be along the lines of helping make a difference and a better world by your own individual efforts and so doing enhance the experiences of others for the future in a positive manner. I will end this correspondence by telling you that I once trapped animals as a younger person in another State for years but I know longer pursue this endeavor. I know that opening up the season on otters will not be as controlled as you think. There are unscrupulous individuals who will take advantage of the season and take more than their share of otters and ignore the laws and sell the hides for profit to underground interests. This is another reason to not give this change in the protections for our reintroduced and/or rare wildlife.

I would like to add that your energies would be more appreciated if you would help the landowner protect his property from trespassers posing as hunters on our lands. I constantly have people putting up deer stands on my properties and when I tell them they are not welcome and must pack up and leave, they argue with me and even tell me to get off my own land! So there you go, work on that problem and leave the otters in peace, they haven't done anything wrong and deserve a chance to become established again in our State's water-ways.

Thank you,

William E. Deeter

Comment Received 12/5/2014 9:38:30 AM

Commenter Name Chris Christensen

City Macy **County** FULTON **State** IN

E-Mail Address dcchris@sbcglobal.net

Comments I am definitely for the trapping of river otters. I live on Nyona lake in Fulton county and we have had a serious problem with the river otters raiding our fish baskets and helping themselves to some of the largest fish in the lake. Remains are all over our docks. Some fishermen say some their fishing holes are gone due to the otters.

Comment Received 12/5/2014 10:07:34 AM

Commenter Name Leo Boyd

City Indianapolis **County** MARION **State** IN

E-Mail Address leshboyd@gmail.com

Comments I am opposed to any law that permits trapping of wild animals as I believe trapping is a cruel and inhumane activity.

Comment Received 12/5/2014 11:37:38 AM

Commenter Name Woody Williamks

City Newburgh **County** WARRICK **State** IN

Organization (optional) Hunt-Indiana.com

E-Mail Address asats@wowway.com

Comments River otters do need to have a regulated trapping season. Quite a few are accidently trapped now and their pelt goes to waste. They can also be quite destructive to private lakes and ponds.

I support a regulated river otter trapping season.

Comment Received 12/5/2014 12:24:59 PM

Commenter Name Rita O'Hair

City Spencerville **County** ALLEN **State** Indiana

E-Mail Address ritaohair@yahoo.com

Comments I vehemently oppose the trapping of river otters. It is inhumane period.

Comment Received 12/5/2014 12:34:11 PM

Commenter Name Roberta Coyle

City Indianapolis **County** MARION **State** Indiana

E-Mail Address bobbiejcoyle@yahoo.com

Comments I am a property owner on a tributary creek to Lake Shafer in Northern Indiana. In the past two years we've begun seeing the river otters in the Big Monon Creek area. They are very elusive and rare to see in the area, but a few glimpses have occurred. A wonderful site!

Speaking for myself and many of my neighbors, we can't understand the need to allow trapping at this time. The otters certainly have not been a nuisance species and we cannot see the necessity of trapping. (a brutal death) Perhaps the populations are growing larger in other areas prompting this rule proposal? It seems that the rule change is motivated by the demand for the animals fur, rather than for an overpopulation issue. At least in our area. We are adamantly AGAINST the rule proposal under the current circumstances. Wildlife management is important to Indiana and it's residents and future generations. Please evaluate this issue more thoroughly before proceeding.

Comment Received 12/5/2014 1:14:04 PM

Commenter Name Theresa Ransbottom

City Fort Wayne **County** ALLEN **State** Indiana

E-Mail Address tmrans@gmail.com

Comments Someone who has a nuisance otter can already get a permit to trap or kill. This is just to open up a trapping season, and sell permits, to trap otters on public land. Since the rivers are public property, I don't see why we should allow this -- what trouble are they causing on public land?

Comment Received 12/5/2014 1:51:10 PM

Commenter Name Nancy Tatum

City Indianapolis **County** HAMILTON **State** IN

E-Mail Address penguinet111@gmail.com

Comments I am commenting on the proposed rule for trapping otters. To begin with, the claim that trapping is humane and that it will be tightly regulated is far from the truth. How will the DFW guarantee that each trapped animal will be reported? In reality, how many otters will be killed illegally?

In regards to an overpopulation of otters, the available habitat and food resources generally limit the size of wildlife populations, which includes otters. When a wildlife population approaches the limit that the habitat can sustain — the "carrying capacity" — reproduction and survival decrease because less food is available to each individual, and the population begins to decline. In this way, nature has been regulating itself for millennia without our help.

Trapping generally removes healthy individuals from the population rather than the sick, aged, infirm, or very young animals most often subjected to natural selection. Trapping actually works against nature's selection process.

Surveys show that most trappers trap for "sport." When an otter pelt is worth \$80 and the "limit" is set at two otters per season, really, can \$160 be worth the trouble, let alone the life of a beautiful animal that the State of Indiana invited back here to live?

The trapping of wildlife for profit is an anachronism in today's society. Its blatant cruelty can no longer be masked under the guise of economics or wildlife management. However, the trapping/fur lobby is powerful and well-funded, and countering its entrenched political power requires dedicated, passionate citizens who recognize that wildlife has intrinsic worth above and beyond its economic value.

I say NO to trapping otters!

Comment Received 12/5/2014 4:09:17 PM

Commenter Name Terry Marker

City Worthington **County** GREENE **State** IN

E-Mail Address tmrkr@yahoo.com

Comments All my lifetime the limit for bluegill has been unlimited. I don't believe putting a limit on them now will improve the size. There has got to be another way.

Comment Received 12/5/2014 5:54:29 PM

Commenter Name Trent Stinson

City Velpen **County** PIKE **State** IN

E-Mail Address trent_716@yahoo.com

Comments Very glad to see the long over-due Otter season added. Thank you!

Comment Received 12/5/2014 8:39:44 PM

Commenter Name Carol Zurschmiede

City Georgetown **County** HARRISON **State** IN

<p>Organization (optional) 1956 E-Mail Address WhiskeyRunsCZ@live.com Comments I think there should be a trapping season on the river otter in Indiana. People that have connecting property to the otter habitat sights have complained about the ponds on their property's being "CLEANED OUT" by the otter's. They are beautiful animals, & I myself was happy to see them reintroduced into our areas, but they have been VERY successful in their numbers & need to be thinned out in some areas. Comment Received 12/5/2014 9:33:15 PM</p>
<p>Commenter Name Sammy fisher City Anderson County MADISON State Indiana E-Mail Address buckhead1210@yahoo.com Comments i oppose the use of high powered rifles, I would like to see an early muzzleloader weekend in late October like Kentucky has Comment Received 12/5/2014 10:05:31 PM</p>
<p>Commenter Name Hal Montgomery City Seymour County JACKSON State IN E-Mail Address hmontgomery@kamiccorp.com Comments River otters, I am 54 years old and up until a few years ago there were not any otters to be seen in the state. Now that we have a few to see and enjoy you want to start trapping them. I hunt, fish and trap but I am very opposed to start killing these animals so someone can have their hide. Hal Montgomery Comment Received 12/6/2014 8:04:29 AM</p>
<p>Commenter Name Jeremy Turner City Martinsville County MORGAN State IN E-Mail Address jdturne1@hotmail.com Comments I think it is an Awesome idea! Great to know that the Otter population is thriving and able to sustain a limited amount of trapping. Comment Received 12/6/2014 8:37:57 AM</p>
<p>Commenter Name Lynette Mroz City LaCrosse County LAPORTE State Indiana E-Mail Address lynmroz@sbcglobal.net Comments I've only seen one river otter in twenty years of hiking at Tippecanoe and other state parks, so I don't think that they should be killed at all, but if you are going to do it anyway, then leave the ones in the state parks alone for people who wish to view wildlife rather than kill wildlife. Wildlife viewers bring revenue to the DNR too, and without shooting up park signs. Comment Received 12/6/2014 9:43:03 AM</p>
<p>Commenter Name Dan Haire City Churubusco County ALLEN State Indiana E-Mail Address foamkiller@frontier.com Comments It is time for an otter trapping season. They have already untold damage to private ponds and lakes. Comment Received 12/6/2014 12:34:42 PM</p>
<p>Commenter Name larry todd stark City brownstown County JACKSON State indiana E-Mail Address tstark14@hotmail.com Comments there is no problem in the sale of squirrel hides in my view why waste this resorce buy just throwing them away.also if the river otter population is strong enough for trapping lets do it Comment Received 12/6/2014 1:02:47 PM</p>
<p>Commenter Name Brad Collings City rosedale County PARKE State In. Organization (optional) furtakers of america chapter7f E-Mail Address trapperbdc@aol.com Comments i believe it is time to allow the taking of the river otter here. I trap big raccoon creek and little raccoon in parke co. and have been seeing thier sighn for 5 years and accidentally caught 2 otters in 2012. both of these warerways are tributarys to the wabash river where otters are very abundant. several of the member of our organization are saying it is nearly impossible to trap the wabash for any species of animal without catching otter. i truly believe the propsed limits and quotas will be met suprisingly quick. Comment Received 12/6/2014 9:15:01 PM</p>
<p>Commenter Name Steve Sendelweck City Ramsey County HARRISON State IN E-Mail Address sendelweck@earthlink.net</p>

Comments This comment is regarding the proposal to allow all centerfire rifle cartridges at least .243 to be used for deer hunting. I understand that many of the "wildcat" cartridges that have been developed for deer hunting in Indiana are as powerful as factory cartridges like .243 and 35 Remington. However, allowing any cartridge .243 and larger will result in calibers such as 300 Winmag and 338 Lapua being used by some "hunters". These and many other rounds are just not appropriate for hunting whitetail deer, especially in populated areas. This will also result in many hunters trying to shoot deer at ranges that are far beyond their shooting ability. I would suggest keeping the current cartridge rule and amending it by adding a list of specific factory cartridges that are more traditional deer calibers. This could include .243, 35 Remington, 30-30, 45-70, etc.

Comment Received 12/6/2014 9:34:26 PM

Commenter Name Tom Kasten

City Winamac **County** PULASKI **State** Indiana

E-Mail Address tomkasten@hotmail.com

Comments I strongly agree with a trapping season for river otters. They have destroyed so many ponds in this area. Several people have filled their ponds in after multiple attempts to keep fish in them. I fish the Tippy a lot and have seen a huge difference in it. Supposedly the muscles are protected but the otters have destroyed most of these.

Comment Received 12/7/2014 6:50:09 AM

Commenter Name Fred Shidler

City Monticello **County** WHITE **State** Indiana

E-Mail Address shidler5310@comcast.net

Comments I do believe it is time to open a trapping season on the river otters. They have ventured away from the rivers. They cleaned out all 8 of our stocked ponds on our golf course, which is very costly to us to restock. We haven't restocked them yet because of the otter problem here in White county. A lot of people may disagree because they are fun to watch but obviously do not have stocked ponds.

Comment Received 12/7/2014 7:25:03 AM

Commenter Name Todd Woods

City Bedford **County** LAWRENCE **State** Indiana

E-Mail Address tawoods1961@gmail.com

Comments I support this rule change.

Comment Received 12/7/2014 8:29:03 AM

Commenter Name Charlene Marsh

City Nashville **County** BROWN **State** Indiana

E-Mail Address Char@CharleneMarsh.com

Comments I STRONGLY OPPOSE establishing a trapping season for river otters. Trapping is an EXTREMELY CRUEL activity that should be BANNED not expanded. Non-target animals as well as the targeted animals suffer tremendously in these barbaric devices that should be OUTLAWED. Time for Indiana to BAN ALL TRAPS.

Comment Received 12/7/2014 1:39:58 PM

Commenter Name Charlene Marsh

City Nashville **County** BROWN **State** Indiana

E-Mail Address Char@CharleneMarsh.com

Comments I STRONGLY OPPOSE the sale of squirrel hides and any portion of a river otter.

Comment Received 12/7/2014 1:52:03 PM

Commenter Name Charlene Marsh

City Nashville **County** BROWN **State** Indiana

E-Mail Address Char@CharleneMarsh.com

Comments I STRONGLY OPPOSE removing river otters from this list.

Amends 312 IAC 9-3-18.4 to remove the references to river otters.

Comment Received 12/7/2014 1:58:17 PM

Commenter Name John Jarboe

City Tell City **County** PERRY **State** IN

E-Mail Address johnj@psci.net

Comments I have only seen 3 otters in the past 7 years. I do not think the population is well enough to harvest. I live on the Anderson river and have only one mating pair within three miles of my house. I have never seen an otter on the Ohio river. I dont think we have a stable population yet

Comment Received 12/7/2014 6:59:56 PM

Commenter Name Erica O'Neill

City muncie **County** DELAWARE **State** IN

Organization (optional) indiana animal rights alliance

E-Mail Address woodstock4774@aim.com

Comments Seriously? Leave indiana's wildlife alone. This is totally unnecessary.

Comment Received 12/7/2014 9:03:15 PM

Commenter Name Randall Marshall

City North Vernon **County** JENNINGS **State** Indiana

E-Mail Address rmarshall@nvpd.org

Comments I am strongly in favor of establishing a trapping season on River Otter. Over the past five years I personally seen otters on the west and east side of Jennings County.

I have seen and photographed them in my stocked pond, eating the fish that I paid hundreds of dollars to stock. My neighbor says his pond has been "cleaned out" by otters too. I have tracked them in the snow and seen their toilets on multiple occasions over the years. In another section of the county I have even seen them while scouting for beaver.

For me to see as many as I do, makes it obvious they are no longer endangered! In fact, they are a nuisance, costing pond owners thousands of dollars.

I would like to see a season opened up for them on an unlimited basis, however, I would not object to a quota either because something needs to be done.

Comment Received 12/8/2014 7:36:35 AM

Commenter Name Keith Wildeman

City San Pierre **County** STARKE **State** IN

E-Mail Address wildemank@gmail.com

Comments I am in favor of a river otter trapping season in Indiana as proposed. This has been needed for some time as the reintroduction and recovery of river otters in Indiana can be considered a success story. Trappers are a small few that provide valuable services to the State by removing nuisance animals, all while spending time outdoors. The past few years that trappers have caught otters incidentally has been a shame that fur has not been able to be sold for to possible make a few dollars on trapping when our most common furbearers are not bringing large profits on pelts.

Comment Received 12/8/2014 10:02:21 AM

Commenter Name Steve Woodard

City Kokomo **County** HOWARD **State** IN

E-Mail Address sttt01woodard@gmail.com

Comments I have had a cottage on the eel river for the past ten years so I can give first hand information on the affect of the river otter. River otters are doing very well. They have big litters, I have seen 8 in tow, are well fed and will travel to find easy prey in ponds. In my opinion there far to many and they are affecting the local fishing and need to be controlled.

Comment Received 12/8/2014 11:33:25 AM

Commenter Name Kim McMunn

City Dayton **County** TIPPECANOE **State** IN

E-Mail Address kmcmunn@comcast.net

Comments I'm told this rule is being changed due to a total of 70 complaints. I know of at least 70 complaints in my neighborhood alone about feral cats, yet we are all stuck living with those. Why would this reintroduced species be subjected to hunting due to a total of 70 complaints state-wide?

If there were hundreds of complaints, otter being hit and killed on the roads, or scientific surveys showing that hundreds of otters were dying of disease or starvation due to overpopulation, that would be one thing. Basing this decision on a few complaints is misguided and a travesty. If those 70 homeowners have problems, they can contact the DNR and be told to contact permitted NWCO to deal with the problem professionally.

Comment Received 12/8/2014 6:15:25 PM

Commenter Name ross staller

City south whitley **County** WHITLEY **State** indiana

E-Mail Address rossestaller@hotmail.com

Comments Let the river otter alone for a couple more years. They are decimating the fish population in our rivers and ponds so maybe they will be a deterrent to the grass carp and alewives

Comment Received 12/8/2014 6:54:02 PM

Commenter Name Dennis Carey

City Greentown **County** HOWARD **State** IN

E-Mail Address dennycarey80@gmail.com

Comments Would absolutely love to see the rule changed to allow high powered rifles for deer hunting here in Indiana please thank u

Comment Received 12/8/2014 7:10:36 PM

Commenter Name Dennis Wickman

City Jasper **County** DUBOIS **State** IN

E-Mail Address dwickman@psci.net

Comments I strongly support passing of the rule allowing trapping of river otters. Although my experience with otters is limited to the area around Dubois county, it seems they have become abundant and limited harvesting would not be detrimental to the population.

Comment Received 12/8/2014 8:16:05 PM

Commenter Name Trent Farrell

City Roanoke **County** HUNTINGTON **State** IN

E-Mail Address teamcurlee@aol.com

Comments A trapping season should be established for otter. This is the best way to manage this resource.

Comment Received 12/9/2014 3:55:17 AM

Commenter Name Kenneth Hauptli

City Terre Haute **County** VIGO **State** Indiana

E-Mail Address khauptli2000@yahoo.com

Comments River otters are making a good comeback. They aren't overpopulating and don't need to be culled. Most trapping causes a slow and painful death and should be outlawed.

Comment Received 12/9/2014 12:31:14 PM

Commenter Name troy Hoffman

City winamac **County** PULASKI **State** Indiana

E-Mail Address tdh5716@gmail.com

Comments I believe this rule to allow otter trapping would be beneficia .the otter population up our way is striving to the point of being a nuisance to pond owners. I'd would hate to know how many have been caught and either turned over to conservation officers or just left on banks. What a waste. Healthy population that needs controlled because they have hardly any predators to control population.

Comment Received 12/9/2014 3:56:22 PM

Commenter Name Jimmy Blades

City Connersville **County** FAYETTE **State** Indiana

E-Mail Address bladesjimmy41@gmail.com

Comments I feel the county bonus anterless needs to dropped there just isn't the deer that we used to have I used to be able to sit and count 20 to 30 deer a hunt I'm lucky to be in a great hunting area but the numbers have dropped we see maybe 4 to 5 deer a hunt now yes that is still numbers but when the neighbors are killing the county number plus some and tagging them under the adjoining county the numbers are dropping I hunt Southern Fayette County the property butts up to Franklin County you kill 4 in Fayette that's 8 deer since the Doe has twins now you kill 8 under Franklin County that is 16 put that together and that's 24 deer per 1 hunter there is 3 of them doing it that's 72 deer a season and that's if they don't wound a couple and not find them that is a big reduction in the deer population plus let's add in EHD that killed of some deer.. thank you for your time and hopefully we think about our youth for hunting in the future because if we keep going the way we are there won't be any deer left also how about the earn the buck rule thank you

Comment Received 12/9/2014 5:13:31 PM

Commenter Name James Jasperson

City Valparaiso **County** PORTER **State** IN

E-Mail Address jdjaster@comcast.net

Comments The otters should NOT be trapped or hunted until they are distributed through out the entire State. After that, hunting could be permitted. Trapping should be outlawed across all of Indiana. It's cruel, and no one in the State needs "trapping income" to support themselves or family!!

Comment Received 12/9/2014 7:09:32 PM

Commenter Name Todd Lang

City LaGrange **County** LAGRANGE **State** IN

E-Mail Address tlangfurs@gmail.com

Comments 9-10-12 has a mistake. The way (e)(2) reads, every animal bought would have to have all of that information. I believe the intent is just for bobcat and badger but it does not read that way. As far as the "date and method" goes, the date is already required on receipts and the method is not necessary. A license is needed to hunt or trap them, not to sell them. As far as (i) goes, I believe this could be a huge mistake. This is placing the disposal of wild animals in the same category as domestic animals. This would then open the can of worms for every person who shoots a wild animal to have to dispose of it properly. We do not need another law. We have littering and there were environmental laws in IC 13-30-2-1 that governed this but the penalty statute was repealed. How about getting the penalty statute back instead of creating new laws? I have several comments on otter trapping. The first point that I would like to address is the thought of not allowing children under the age of 10 to trap otters and check them in. One of the reasons given was because they are not strong enough to set 330s and that most of the incidentals were caught in them. I would agree that most children under the age of 10 are not strong enough to set 330s. However, did we forget that the original otters brought here were trapped in #11 double longspring foothold traps? This is a small trap. Many incidentals have been caught in 1 1/2 coilspring traps, which are used for raccoon. Otter can be trapped using snares. Children under the age of 10 can use these smaller traps along with snares to catch them. They can use these in shallow water at the edges of crossovers and slides and be successful at it. They can use 220 body grips on dry ground in trails that run along dry creek beds. The 330 has to be placed under water and this means the water would probably be deeper than the child is tall so they would not be using them anyway. I have been told this was the trapping organizations idea but they say it wasn't. I have been told it was law enforcements idea but they say it wasn't and so on. Then I heard it was the furbearer biologist. If nobody is willing to claim this idea, then obviously it is a bad idea. If overbagging is the worry then that would be law enforcement's job to investigate it. The children should not be pre-punished for it. How many times have we seen someone advertise a partial truth to get what they want? This is the fear that I have with this decision. You are taking one example to prohibit children from trapping while you are not even considering

all of the other valid examples to allow them to trap. How many times have I heard people talk about why we are losing youth in outdoor activities? How many work hours have been spent trying to figure this out? But yet, in my opinion, if this goes through then here is a prime example of why we lose children in outdoor activities. Furthermore, the Div. of Fish and Wildlife's publication of Avoiding Otter While Trapping Beaver and Raccoon says a lot. The title itself explains everything by saying that you can catch an otter when you trap beaver and raccoon. The children are not prohibited from trapping beaver and raccoon. Again, children are very capable of setting raccoon traps and these traps are capable of catching otter. You wanted them to avoid the otter but now that there is a going to be a season you are saying that these same traps are now not good enough for a child to catch an otter. The publication itself says that raccoon sets along water edges are dangerous to otters. Another excuse I heard for this was that other states had 4 and 5 year olds checking in otter and this rule would stop that. This would be a law enforcement problem and not a reason to restrict children from trapping. A violator is a violator. If not their kids, then they will have their friends, neighbors, parents, brothers, sisters, etc. check them in. In order to stop this, do we need to add a law that says if you have not purchased a trapping license prior to 2014 then you cannot purchase one now because you may be taking part in the illegal taking of otter? I hope you see how ridiculous this statement is and then apply it to the reason given for not allowing children to participate. When the one buck rule was passed the same thing was said and the violators did it. However, you did not pass a law stating that children under 10 could not hunt antlered deer. You have passed free youth hunting days, youth hunting weekends, and free fishing days for the people that hunt and fish. What have you done for the adults and children that trap? I do not know any of them that have asked you for free days. However, there continues to be a discussion about punishing the trapping children for something that they have not done. Another reason I heard was because of the price. This does no matter. Prices fluctuate. Please do not punish children because of myths, misunderstandings, and what ifs.

Comment Received 12/9/2014 8:45:37 PM

Commenter Name Tina Sims

City Indianapolis **County** MARION **State** Indiana

E-Mail Address indianasims@sbcglobal.net

Comments I strongly oppose the proposal to allow trapping of river otters -- animals that Indiana has brought back from extinction. I'll never forget the first time I saw river otters -- at the Muscatatuck National Wildlife Refuge -- and witnessed how much fun they were having sliding on the rocks in the creek and playing with each other. A truly joyful moment in nature. And now you want to let trappers kill them just for their fur? This proposal is cruel, sickening, and heartless. Please defeat this plan.

Comment Received 12/9/2014 9:00:42 PM

Commenter Name Todd Lang

City Lagrange **County** LAGRANGE **State** IN

E-Mail Address tlangfurs@gmail.com

Comments Part 2: To continue, my other concern is the Trapper Education requirement. This is not required for the other furbearers so why would you require it for an otter? This is just another furbearer and that is it. But if you do, who is going to teach it? Where is the money going to come from to teach it? How are you going to get every kid that traps to a class? Secondly, I have concerns with having to check the otter carcasses in. What happens if the otter goes to a taxidermist? Why can't the trapper sell the otter on the carcass to a fur buyer like they can do with any other furbearer? From my understanding, the discussions have assumed that none of the trappers would be selling them on the carcass. Do we really need to pass a law that demands that otter carcasses be turned in? If the season has a maximum of 600 otters taken, can the biologists really study every one of these carcasses? If you look at the actual days worked and then subtract holidays, vacation days, sick days, and training days then they are going to have to study around 3 otters a day. This does not include the accidental kill of otters outside the season and it does not include the bobcat and badger that come in and need to be studied. The biologists are busy people and I am not trying to tell someone how to do their job. Do they really have the time to do all of this? Would a voluntary turn in of carcasses be more practical? All you have to do is explain why you need the carcasses and I believe that most trappers and fur buyers would do this for you. There was an article in the Fur Taker magazine where the trappers helped skin the otter for the biologist to help out in their studies. I believe the otter were released in January of 1997. This has been almost 18 years. They have said that they have studied all of the accidental kills. This is almost 18 years worth of studying. How can we get any more information that we don't already have? I just do not understand. Many people in this State think they are a nuisance, especially a pond owner that likes to fish. It appears that these laws are treating them like gold when in reality they are just an otter that needs their numbers reduced. Instead of passing a large amount of laws regarding otter, how about simplifying it something like this: The season for trapping otter is from November 15-December 01. The limit is 2 per person. CITES tag must be obtained for each otter by December 15 at 3:00 PM. Period. Then advertise and ask for voluntary turn in of otter carcasses. In closing, I am not trying to offend anyone or their ideas. The problem is that we are getting so many laws that people are getting confused and therefore subjecting themselves to violating the law by accident. I would ask that you please simplify this. I would also ask that you reconsider your thoughts, especially when it comes to prohibiting children under the age of 10 from trapping otter. Thank you for your time and for considering my thoughts.

Comment Received 12/9/2014 9:23:08 PM

Commenter Name Patrick Harbeson

City georgetown **County** FLOYD **State** Indiana

E-Mail Address harb7676@gmail.com

Comments I think it will be a great to have rifles for deer hunting in Indiana. I can't wait!

Comment Received 12/9/2014 9:31:16 PM

Commenter Name ronald marhenke
City waterloo **County** DEKALB **State** indiana
E-Mail Address rkmvetteman@hotmail.com
Comments I vote no on trapping season for river otters
Comment Received 12/10/2014 5:36:26 AM

Commenter Name Jan cain
City Colfax **County** MONTGOMERY **State** IN
Organization (optional) Indiana Master Naturalist
E-Mail Address jan_cain@hotmail.com
Comments I think it is a sad state of affairs when we have decimated a species as bad as we did the otters, spend money to reintroduce them and get them established and then start killing them off again. Will we NEVER learn?!!!! I have yet to see my first wild otter even though we have looked and looked. PLEASE do not let them start murdering the otters again so our children and grandchildren do not see them. Remember the passenger pigeon! Thank you for considering NOT allowing them to be trapped.
Comment Received 12/10/2014 9:12:25 AM

Commenter Name Daniel M. Petry
City Bristol **County** ELKHART **State** IN
E-Mail Address danpetry@frontier.com
Comments In one winter the river otters in the upper St. Joseph River decimated the rock bass population--or at least that's what I attribute their decline to. In the summer of 2013, I caught scores of rock bass while fishing for smallies. This summer I caught only one or two. I watched the otters from my picture window on the river, sometimes fishing in packs of 5, eat rock bass all winter long. I am in favor of allowing a trapping season. While I enjoy watching otters, their numbers may start to threaten the gamefish population of the river, though the bass fishing was strong this year.
Comment Received 12/10/2014 10:55:07 AM

Commenter Name Thomas E. Geisler
City Idaville **County** WHITE **State** Indiana
Organization (optional) Indiana Stte Trappers assn
E-Mail Address tomstrap@yahoo.com
Comments It is in my opinion that my area & many other areas of the State of Indiana have a very trappable population of otter.
Comment Received 12/10/2014 1:21:30 PM

Commenter Name Doug Allman
City Fishers **County** HAMILTON **State** IN
E-Mail Address dna1975@embarqmail.com
Comments Proposed Rule
 LSA Document #14-341
 DIGEST
 Amends 312 IAC 9-2-3 to allow the sale of squirrel hides and any portion of a river otter. Amends 312 IAC 9-3-18.2 to establish a trapping season for river otters. Amends 312 IAC 9-3-18.4 to remove the references to river otters. Amends 312 IAC 9-10-12 governing fur buyers' licenses.
 I am against the sale of Squirrel hides as they are game animal and should not be commercialized. The IDNR preaches the 7 pillars of conservation and yet they are picking and choosing which animal they will allow to be commercialized. While the threat to squirrels from selling hides my be minimal at his time, something unforeseen in the future could create a market that could cause harm to the resource. The inconsistency in IDNR policy regarding commercialization and privatization has cam back to haunt them several times. Standardize your policy and stop commercialization and privatization of wildlife. Don't crack open the door of a potential market where none exist. People have the ability to gift these now.
 I am not opposed to trapping river otters as they are a traditional fur bearer.
Comment Received 12/10/2014 3:58:34 PM

Commenter Name Dee Fox
City Carmel **County** HAMILTON **State** IN
E-Mail Address dasfox2009@gmail.com
Comments I am unable to attend the hearing, but I oppose the indiscriminate killing of reintroduced otters whose natural search for food is deemed an inconvenient "nuisance" by a relatively small number of people. Most people feel joy and appreciation at the sight of wildlife and are willing to make adjustments so that displaced wildlife can continue to live here.
 Unfortunately, a sad history continues of humans killing animals for recreation or profit. How incredible that we acknowledge intelligence and emotion in our valued chosen pets and consider them family, yet we treat all other animals like dispensable soulless objects for our exploitation. Since there is no longer any survival necessity for us to kill wild animals for food or clothing, the modern playbook seems to be hunt/trap to near extinction, reintroduce a few to avoid extinction, complain they're a nuisance, and repeat.

It is not possible to "manage" the killing of otters via voluntary honest reporting, especially when pelts bring \$80 each. The existence of rules, limits, or quotas doesn't mean they'll be followed. States have neither the staff nor the money to adequately enforce the rules or monitor results. With no accurate way to know how many otters there are, allowing 11,000 total kills a year by 5500 licensed trappers is excessive. Then you can add in financially motivated poachers who won't be deterred by slim chances of being caught and light penalties. At the very least, please do not allow any financial gain from killing otters for their body parts. All pelts should be turned in to the DNR.

Trapping led to the extinction of otters in Indiana within 21 years of establishing protections that came too late. Otters reintroduced 53 years later took 10 years to get off the endangered list and 18 years to fully rebound. We don't seem to learn. Otters can quickly be hunted/trapped to near extinction again just like the reintroduced gray wolves out west have been since their protections were removed in 2011, placing them under state "management" policies. In spite of that lesson, it's now being proposed to also revoke protections for the small number of wolves in the rest of the U.S. Once we reduce a species' genetic diversity past a certain point, extinction is inevitable.

I am concerned by the large numbers of endangered species due to human causes. No one believed it was possible for people to cause the extinction of billions of passenger pigeons, but we did. Recent local efforts to increase deer hunting, allow otter trapping, and increase coyote trapping are worrisome. People who complain about the animals are often uninformed, needlessly fearful, and/or do not want to be inconvenienced by even small changes to their own behaviors to allow coexistence.

I've always assumed that natural resources/wildlife management agencies were tasked with protecting our dwindling wildlife. However, upon looking closer, it sure appears to be more about protecting/encouraging hunting and trapping, retaining those license fees, and about accommodating people who complain for any reason that they want certain wildlife killed. A widespread killing response to a few hungry "problem" animals seems like, well, overkill. It may require more effort and adjustment on our part, but there are usually steps we can take to coexist with wildlife.

Do objections to the proposed plan really make any difference? You will undoubtedly hear mostly from those who stand to gain from allowing trapping. The 2014-2015 DNR Hunting & Trapping Guide already advocates trapping the currently protected otters. In my experience, public input on most disputed proposals, especially on environmental issues, has become just a formality. It rarely results in meaningful changes to or reversal of the predetermined plan. I hope you will prove me wrong by finding an alternative to this flawed widespread trapping policy.

Sincerely, Dee Fox

Comment Received 12/11/2014 1:37:53 AM

Commenter Name Keith Starling

City Noblesville **County** HAMILTON **State** Indiana

E-Mail Address a4birdman@gmail.com

Comments I oppose the rule change to allow a trapping season for the River Otters. I also oppose the sale of River Otter pelts or other body parts.

The River Otter was reintroduced in Indiana rivers with much fanfare and celebration, a symbol of victory for cleaning up our rivers and streams. I attended and participated in the ceremonies hailing the reintroduction as a victory for Indiana and the health of our streams and environment. To now back track and allow the trapping of this species that we paid to reintroduce is a slap in the face to the tax payer and sends a poor message on our environment and the wisdom of the DNR.

Comment Received 12/11/2014 9:33:33 AM

Commenter Name William J Wampler

City Huntingburg **County** DUBOIS **State** Indiana

E-Mail Address jbwamp@twc.com

Comments I agree this rule change on the taking of river otter is a change that is due and I support this change.

Comment Received 12/11/2014 9:39:45 AM

Commenter Name Gregory S. Griffin

City Shelbyville **County** SHELBY **State** IN

Organization (optional) Mr.

E-Mail Address gs_griffin@yahoo.com

Comments The main argument by Indiana State Trapping Assoc. (over 5,000 some trapper members strong) is that without trapping river otters in Indiana their population will go unchecked and the implication is that they will become a large nuisance than occasionally taking a fish out of someones pond or fish hatchery. This is all proposed as river otter population management. I believe their motivations have more to do with greed - the \$80 per pelt they want - plus I'm concerned about additional poaching takes beyond what's proposed.

Plus, I believe there are legitimate concerns about messaging that has been used here in Indiana to justify implementing

river otter trapping seasons. Arguments that river otters will grow to overwhelming population sizes without harvest, is a misrepresentation to the public. Wildlife in the United States is a Public Trust and, hence, all citizens should have the opportunity to be heard regarding policy making. My concern would be if the justification for harvest went beyond portrayals of a sustainable resource in a way intended to influence the public by suggesting dire consequence without harvest. Improper or partial portrayals by public officials to influence the public are, in my opinion, a severe breach of the "Public's Trust." Of particular concern would be portraying a native species (river otter or other) as a nuisance – hopefully that won't be the case any longer in Indiana.

River otters were on the Endangered Species list here till 2005 and many counties still don't have many to date, so I don't buy ISTA's argument, and I would prefer if they want to control river otter populations by trapping so bad, then trap them and move them to other locations in Indiana where river otters are still scarce or completely lacking in the environment as the result of previous over trapping.

Finally, history repeats itself - won't we ever learn? - river otters were eliminated by trappers/poachers once before. Why allow them to be trapped again? - under the guise of animal management which is a breach of the the public trust.

Thank you.

Comment Received 12/11/2014 9:39:57 AM

Commenter Name Gail C. Griffin

City Shelbyville **County** SHELBY **State** Indiana

E-Mail Address gcgriffin09@yahoo.com

Comments Allowing trapping of the river otter is cruel practice that should not be allowed again in Indiana. We walk our dogs and had one of them get caught in trap once - we were not very happy about this to say the least! On another occasion, a trapper "poacher" had put a trap in a public park and we found a trap where an animal had actually chewed its leg off to get out of a trap - not a pretty site or one we'll ever forget. What a cruel way to earn a little money for an animal's life/fur. Animals have feelings and should have some rights, too. There ought to be limits set on how far humans can go in invading and destroying their habitat and life. I just don't understand the sport of trapping - it's like trapping your pet and then killing it for it's fur. Taking a life from the wild - all that animal has destroyed and in such a cruel way! And the river otter was on the Endangered Species list until 2005, why would we allow it to be trapped now before its population has recovered completely throughout Indiana? How many river otters are too many to allow trapping in the name of animal control? This just does not make sense to the public at large!

Comment Received 12/11/2014 10:18:54 AM

Commenter Name June DeLong

City INDIANAPOLIS **County** MARION **State** IN

E-Mail Address junedelong@sbcglobal.net

Comments I am AGAINST changing the rule to allow trapping of river otters. Taxpayer dollars were used to reintroduce them so that trappers would have something to kill in the future? This is outrageous!

Comment Received 12/11/2014 10:46:28 AM

Commenter Name Greg Griffin

City Poland **County** OWEN **State** IN

Organization (optional) Mr.

E-Mail Address gsggriffin48@gmail.com

Comments The main argument by Indiana State Trapping Assoc. is that without trapping river otters in Indiana their population will go unchecked and the implication is that they will become a large nuisance more than occasionally taking a fish out of someone's pond or a fish out of a fish hatchery. This is completely unproven and only future speculation. Further, they say trapping is the only solution proposed as river otter population management. I believe the motivation for trapping has more to do with greed - the \$80 per pelt they want - plus I'm concerned about additional poaching will take place beyond what's proposed – further impacting river otter population numbers.

Plus, I believe there are legitimate concerns about messaging the public that has been used in Indiana to justify implementing river otter trapping seasons. Arguments that river otters will grow to overwhelming population sizes without harvest, is a misrepresentation to the public. Wildlife in the United States is a Public Trust and, hence, all citizens should have the opportunity to be heard regarding policy making. My concern is that the justification for harvest has gone beyond portrayals of a sustainable resource in a way intended to influence the public by suggesting dire consequence without harvest. Improper or partial portrayals by public officials to influence the public are, in my opinion, a severe breach of the "Public's Trust." Of particular concern would be portraying a native species (river otter or other) as a nuisance – hopefully that won't be the case any longer in Indiana. Frankly, this argument is getting a bit old while our wildlife numbers may not be sustainable with all the trapping /kills proposed. There is already significant loss of habitat caused by man that will hold river otter population in check. How many river otters are enough or too many? When was the last time you saw a river otter or it was nuisance to you.

Just a side note here... We went to Goose Pond and also Muscatatuck National Wildlife Refuge last summer with the understanding that we'd see some river otters and didn't see even one and we were looking for them! Surprisingly, it's my understanding Goose Pond doesn't have them.

River otters were on the Endangered Species list here till 2005 and many counties still don't have many to date – Central Indiana for example. So I don't buy ISTA's argument that their population needs to be managed by trapping them for their

fur. I would prefer if they want to control river otter populations by trapping them so bad, then trap them and move them to other locations in Indiana where river otters are still scarce or completely lacking in the environment as the result of previous over trapping and loss of habitat.

Finally, history repeats itself - "Won't we ever learn?" - River otters were eliminated by trappers/poachers once before. Why allow them to be trapped again...under the guise of animal management, which is a breach of the public trust - in my opinion? The NRC and DNR ought to be protecting Indiana's wildlife, not helping trappers destroy Indiana's remaining wildlife. I would like to see/experience river otters in the wild and want my children and grandchildren and future generations to have the same opportunity.

Thank you.

Comment Received 12/11/2014 12:03:10 PM

Commenter Name Greg Silver

City Indpls **County** MARION **State** In

E-Mail Address trusteeegksilver@yahoo.com

Comments The DNR has a bad name for killing things. As to the otters, some empathy to relocate to other parts of the state is appropriate.

is in order to just trap and relocate to such places that have no otters.

How about Eagle Creek Park to that body of water and estuary. That would be good for all .

Comment Received 12/11/2014 1:47:58 PM

Commenter Name Carmen Dumauual

City Indianapolis **County** MARION **State** Indiana

E-Mail Address cdumauual@gmail.com

Comments Re: LSA Document #14-341; Amendments to Allow Trapping Season for River Otters and Sale of Any Portion of a River Otter

I am citizen who is concerned about the proposal to allow a trapping season for river otters and to allow sale of any portion of a river otter. I am strongly opposed to these proposed amendments.

As human populations continue to expand, constantly encroaching on traditional wildlife habitat, human/wildlife contact will continue to become more prevalent. Hunting and trapping will not solve the issues at hand. The otters that remain will continue to do what animals do and that is to expand their territory in search of rich and reliable food sources, which could include water bodies on private territory or commercial fish hatcheries (especially as overfishing and habitat loss lead to declining food sources in other areas). River otters are opportunists that can smell large concentrations of fish and will follow that smell, even in to urban areas. Controlled killing of these animals is not an effective solution.

Efforts should first be made to manage the human-otter conflict non-lethally by tackling the root of the problem. For example, hatcheries should develop improved containment systems to prevent access of and predation by river otters. Improved methods for containing and disposing of garbage (removal of the attractants) have significantly reduced negative interactions between bears and humans in our national and state parks. Similar approaches should be tried for the river otters before any hunting/trapping programs are considered. If access to the attractants in an area is not removed, the river otters will continue to move into these areas regardless of the size of the population (unless we begin to eradicate them again as legal trapping of these animals has previously done).

Human population growth makes it difficult to not consistently experience human interest/wildlife conflicts. As our population continues to expand, we must find non-lethal ways to co-exist with nature in harmony. River otters are important to the balance of our ecosystem. Their presence also promotes tourism. I myself have specifically visited some of our state parks for the sole purpose of viewing the river otters. I am concerned that the complexity and difficulty of regulating the quota and bag limits, as well as a lack of established penalties for exceeding the bag limits will again lead to a rapid decline in river otter populations throughout Indiana. Most importantly, the proposed rule amendment will do nothing to correct the root of the problem. If people fail to correct and change their own environments, the problem will never be fixed and the cycle of imbalance will continually repeat itself.

Please vote not to amend the rules to allow the trapping, killing, and/or sale of Indiana river otters.

Thank you for your consideration,

Carmen Dumauual

Indianapolis, IN

cdumauual@gmail.com

Comment Received 12/11/2014 2:00:02 PM

Commenter Name Robin Meyer

City Indianapolis **County** MARION **State** Indiana

E-Mail Address dandydoggies@aol.com

Comments I am against the proposed rule change regarding the legalization of trapping of river otters. According to the November 13, 2014 article in the Indianapolis STAR, Linnea Petercheff (spokeswoman with the DNR) stated that river otters are..." moving into commercial fish hatcheries where they gobble up expensive captive prey." No statistics from DNR were

included from the DNR representative to substantiate what constitutes what gobbled up means in amounts or loss in revenue to the hatcheries. What non-lethal methods have the hatchery owners used to discourage the otters? Have double wire electric fences been used or other proven barriers that can be constructed been tried? That information was not provided either. What non-lethal alternatives are there to controlling the otter population are there? Can some of our healthy IN otters be used in reintroduction programs in other states? One would hope that licensed trappers would use the most humane methods possible but can DNR control the non-licensed trappers which we all know will try to make an easy dollar selling the pelts. Once the market is reopened do we have enough resources to control it? I find it ironic that we wanted these animals back in our state, but once established, we only think of the easy way to control...by lethal means.

Comment Received 12/11/2014 4:10:16 PM

Commenter Name Rachael Waltke

City Indianapolis **County** MARION **State** Indiana

E-Mail Address waltker20@aol.com

Comments I believe there should be language added to the rule that describes the legal methods by which otters can be trapped. I have heard rumors that a common trapping method is to drown the otters with traps placed in the water. This seems unnecessarily cruel and I hope the rule can outline more humane trapping methods.

Comment Received 12/11/2014 6:57:57 PM

Commenter Name denise hays

City west lafayette **County** TIPPECANOE **State** IN

Organization (optional) .

E-Mail Address dlhays59@hotmail.com

Comments A river otter trapping season is not needed to handle 86 complaints. Those 86 people lodging complaints have an avenue to remedy their problem: Nuisance wildlife permit holders should be hired to target the otters that are causing issues. Two pelts worth \$160 is not an economic benefit worthy of implementing a trapping season.

Comment Received 12/11/2014 8:13:53 PM

Commenter Name Allison Lange

City West Lafayette **County** TIPPECANOE **State** Indiana

E-Mail Address Amlange@purdue.edu

Comments The river otter belongs in Indiana, and should be allowed to live free of the fear of trapping. I am a lifelong resident of Indiana, and I have never once had the opportunity to see one of these animals in the wild, and I am not convinced that they are over-populated. I do propose a solution. I propose that the DNR provide harmless traps to citizens with nuisance otters. These traps would allow the otters to be relocated instead of killed. Other states with otter extinction could benefit from the relocation of Indiana otters, just as our state did. Thank you for this time.

Comment Received 12/11/2014 8:43:16 PM

Commenter Name Eric Lange

City Noblesville **County** HAMILTON **State** IN

E-Mail Address asuryuu@gmail.com

Comments Otters are one of the most beloved wild animal species thanks to their gregarious and playful nature. I find the idea of trapping these wonderful creatures barbaric and repulsive. Regardless of the trapping mechanics (assuming the archaic toothed style traps are no longer in use) the animal will still suffer from the extremely stressful situation of being completely immobilized. Make no mistake stress is a form of pain.

Otters feasting on citizens' stocked artificial ponds is not a sign of overpopulation. It is simply a result of a successful energy strategy. Otters will choose the tiny enclosed artificial pond over catching them in the 'wild' every single time regardless of the size and health of the population. Using this as a reason for an otter season is absurd. Not to mention that there already exists a process for handling nuisances.

Comment Received 12/11/2014 8:56:02 PM

Commenter Name Heidi Shoemaker

City Indianapolis **County** MARION **State** Indiana

E-Mail Address boilergrad@aol.com

Comments I am writing to request that river otters remain a protected animal in the State of Indiana. As you know, river otters were extirpated in the 1940's due to habitat destruction and trapping. The State brought river otters back to Indiana in 1995 and now some people are claiming they have become a nuisance. The same thing has occurred with white-tailed deer. If the DNR makes the decisions to reintroduce extirpated species, we need to work on educating the public on how to live in peace with these animals. People need to be held accountable for the areas they choose to live. If you move to the country for the peace and quiet, you can't complain when deer start eating your landscaping just like if you move in next to a major waterway and build a koi pond that gets raided by river otters. There are already steps in place if a river otter is deemed a true nuisance to a home owner (a poorly placed koi pond, is the home owners problem, not the river otter's) and those steps are an acceptable means of dealing with truly nuisance animals. I have tried to read up on otter trapping and it is hard to find websites that want to be brutally honest about what happens to a river otter in a trap. From what I can tell, many trapping methods involve catching the river otter below water level and keeping them submerged until they drown/asphyxiate. This by no means should be allowed to be the end of any animal. There is nothing humane about leaving an animal without air until

they eventually die. This is cruel and to me it seems like torture. Currently, if you have a nuisance river otter, it says that you can trap it and that DNR will euthanize it for you. This seems like a far more humane way to deal with any issues that arise. In addition, trapping and killing animals strictly for their fur is no longer a necessity for survival. There was a time when it was very necessary, but that time has passed. Lastly, I know that the DNR is funded heavily by hunting and fishing licenses. I also know that budgets are never as large as we would like them to be. I would like to see more emphasis placed on ways for the DNR to increase revenue that did not rely so heavily on these licenses. By doing so, it may remove the temptation to continue to add to the list of animals that you may hunt, trap, or fish in the State of Indiana. I appreciate your time and I wish that I could have attended the public hearing to learn more about this issue.

Comment Received 12/11/2014 9:15:31 PM

Commenter Name Gregory S. Griffin
City Shelbyville **County** SHELBY **State** IN
Organization (optional) Mr.
E-Mail Address gs_griffin@yahoo.com

Comments One last word... After attending the meeting on the proposed rule to once again allow the practice of trapping/killing wild North American River Otters for their fur pelts in Indiana again, I'm troubled that I'm likely fighting a losing battle against this proposal. It's obvious that the Indiana State Trappers Association (over 5,500 some members, who have a vested interest in this proposal) will support it as a solid block/lobby - even if there is not sufficient evidence to once again justify trapping. After all is said and done, most citizens are not going to show up at a meeting or write an email for or against something unless it impacts them. But, as I said in the meeting, I would almost guarantee most citizens are against the cruel practice of fur trapping/killing a poor, defenseless, wild animal. If this public policy of again allowing river otter trapping was put on the Indiana ballot, it would surely be voted down by the majority of Indiana voters. And, as I said in the meeting, using the scare-tactic of saying that unless trapping of river otters is allowed, river otter populations will grow to overwhelming sizes is a huge jump to false conclusion and significant breach of the Public's Trust. The NRC and DNR are entrusted with protecting our wildlife not their destruction to please the interests of a large-lobby interest group like ISTA. Just thought I needed to reiterate the obvious hypocrisy to the process, if a lobby of 5,500 people - who have a vested interest - control this issue that impacts all citizens of the great State of Indiana. Thank you for your consideration of my comments.

Comment Received 12/11/2014 9:30:10 PM

Commenter Name Jonathan P. Schulz
City Plainfield **County** HENDRICKS **State** Indiana
E-Mail Address jonpschulz@hotmail.com
Comments Jonathan P. Schulz

1329 Keller Drive
 Plainfield, Indiana 46168
 317-839-5328

I am writing this letter to the Natural Resources Commission to state my strong objection to this proposal and reasons thereof. Tonight I also attended the meeting at the Plainfield Public Library and was able to comment there. I believe this proposal is unnecessary, irrational, and not in the best interest of Indiana's environment or citizens. The river otter was wiped out in Indiana in the 1940s due to over-trapping and it took fifty years to get them back in the hoosier state. Now, after only 20 years, the river otter may be in danger again. If this were to happen I can only imagine a point down the road where we might wonder, once more, what has happened to the otters in Indiana. Not one single document exists that shows an over-population of river otters. Their numbers have not exploded, as some, such as Indiana trappers and their organizations, have suggested. This is not a species without natural predators, as they might lead you to believe. Indiana has plenty of coyotes, foxes, and birds of prey that hunt otters. This species has not destroyed crops, farmland, or otherwise been a menace to our land or economy. Public land, such as state and national forests or parks is not in danger of habitat destruction from river otters. Their numbers are improving and otters are no longer endangered in Indiana, but their population is no where near what it was before extinction; in fact, the state is more than capable of handling more river otters.

This proposal arose from a very limited number of complaints by landowners of ponds and hatcheries. I feel it is the responsibility of these private landowners to protect their own waters from river otters by means of barriers, such as fences. We should not allow a select few, with lobbyists from the trapper organizations, to ram this proposal through. We should not change the law just because a few folks don't like river otters eating from their ponds. There are ways to prevent that without trapping. Trapping is an archaic form of hunting that belongs to the past. Even with so-called humane traps that don't torture and kill the animal, upon being trapped the animal will be shot or bludgeoned to death. That is the antithesis of humane. Instead of death, why not re-locate otters to other parts of the state, or other states? Central Indiana has very few river otters. Why not move them here? River otters are not killed for their meat, only their pelts. This practice does not belong in today's society. There are plenty of creatures that eat fish from these folks' ponds. Other mammals, fish, and birds devour just as much as otters. Egrets, ducks, kingfishers, pelicans, herons, and others take in more fish than all the otters combined. And then there is the bald eagle. Bald eagles enjoy taking fish from these bodies of water as much as the otter. Why not kill the bald eagles too? They're not endangered anymore either. We have plenty of bald eagles now. I've seen

them all over the state, even right here in Plainfield along White Lick Creek. I've yet to see a river otter. Why kill them? Perhaps because they are easy to trap and have a pelt one can sell for profit. This line of thinking is irrational. Why take the effort to bring back otters, then kill them all over again; just to please a fringe crowd and a few landowners.

Finally, I don't believe the DNR has the resources or abilities to ensure proper regulation if this passes. We know poaching exists in Indiana. How can the DNR monitor how many otters one traps on their own property? I feel this could potentially get out of hand and we will have dwindling populations of river otters. Then another proposal would be presented to stop the previous one. Haven't we learned anything? If only this proposal could go before the public for a vote, but of course that won't happen because those who favor it know it would die. Please make the right decision and do not allow the trapping of river otters.

Thank you for your time.

Sincerely,

Jonathan P. Schulz

Comment Received 12/11/2014 9:58:12 PM

Commenter Name Debra Lange

City Noblesville **County** HAMILTON **State** IN - Indiana

E-Mail Address langedebra@att.net

Comments I am opposed to the proposed rule change allowing the trapping of river otter. If they have become a nuisance in certain sections of the state, would it be possible to relocate them to areas where they are under populated. It is my understanding that some residents have a problem with otters eating fish from their stocked fish ponds. Which is a more natural habitat, otters in the rivers or stocked fish in a man-made pond?

Comment Received 12/11/2014 10:26:33 PM

EXHIBIT C

Division of Fish and Wildlife Response

312 IAC 9-3-18.2: River Otters

The Division of Fish and Wildlife (DFW) has the responsibility for the management and protection of Indiana's wildlife resources. The focus of our wildlife management efforts is to maintain healthy and viable wildlife populations using the best science available. White-tailed deer, beaver, and wild turkey are examples of wildlife species in which populations were once extremely low, but are now sustainably harvested using established seasons and regulations that are enforced by Indiana Conservation Officers. The proposed rule requires strict limits on the number of otters that can be taken and mandatory registration of harvested otter. Current state law and rules governing trapping already require traps to be checked at least once every twenty-four (24) hours and limit the size and types of traps that can be used. The proposed trapping season will not adversely affect the river otter population.

All of our neighboring states now have established otter populations, as well as regulated otter trapping seasons. Ohio, Kentucky, Illinois, Missouri, Iowa, and West Virginia all reintroduced river otter in the 1980s and 1990s. Their reintroductions were followed by regulated trapping seasons as this is the best tool to manage otter populations. Currently, regulated trapping is used to manage river otter in at least 33 states, many of which reintroduced river otter.

The DFW is recommending that only 66 counties be open to trap otters, with 26 counties in central Indiana remaining closed, with a statewide quota of 600. The counties open to harvest are in watersheds where river otter were originally relocated, have had time to establish, and where populations are doing well. The 26 counties in central Indiana that would remain closed are within watersheds where river otters were not reintroduced and have not become established. A feasibility study complete in 1994 suggests that river otter habitat is less optimal within these closed counties/watersheds. This proposed rule will ensure otters continue to thrive in Indiana while allowing sustainable harvest in areas of the state where they are doing very well. The conservative bag limit and statewide quota are designed to allow otters the opportunity to continue to expand their range and population densities in central Indiana.

River otters are elusive animals, have large home ranges, and spend time in wetland habitats that aren't easily accessible. Managing them without regulated trapping is difficult for these reasons. Trapping is managed through scientifically-based rules, and the DFW continually reviews capture methods and develops rules that consider the animal's welfare. Educational programs are conducted throughout the state each year by DNR staff and other certified trapper education instructors.

Several comments from individuals that oppose lethal trapping suggested that the DNR should utilize live trapping and relocation to manage the river otter population. Management via live trapping and relocation of river otters is not an option as it is cost prohibitive, moves problem animals to other properties, and, often results in the death of the relocated animal anyway. When habitat is currently occupied by a species, when an animal is relocated to less than optimal habitat, or when an animal is relocated to a state where that animal can be lethally trapped, relocation often results in the death of the animal.

Additionally, the DFW believes that the age of ten (10) is an appropriate minimum age unless the child has taken trapper education (see subsection a). The trapper education course helps ensure that the youth is knowledgeable on how to properly set traps, the laws and rules governing trapping, their responsibility as a trapper, ethics, how to reduce captures of non-target animals, and best management practices for trapping river otters. While snares and some footholds can be easily set by a child under the age of 10,

the most common traps set to capture otters are body-gripping traps that require some strength to set safely without the use of tools. The DNR, along with trapper education instructors, conducts 20-30 trapper education classes each year, and more can be held as the need arises.

The DFW plans to provide a grace period of 48 hours for trappers through temporary rule if the statewide quota is reached prior to March 15 and the trapper has legally set a trap for otter within the season and has not yet met the 2 per person bag limit.

The DFW is requesting a technical change to modify subsection (h)(1) to reference the tag required in 50 CFR 23.69, and not the Convention on International Trade in Endangered Species of Wild Flora and Fauna for each hide. This makes it easier to understand and comply with federal requirements. Federal law in 50 CFR 23.69 includes the requirement of a tag for river otters that are exported out of the country. The proposed revised language would be as follows:

(h) An individual who takes a river otter during the trapping season must retain possession of the river otter and cause delivery of the skinned hide and carcass, including the head, of the river otter to a designated department employee or official river otter checking station within fifteen (15) days after the month of harvest. The department employee must:

- (1) issue a tag and attach it to each hide in accordance with 50 CFR 23.69; and**
- (2) maintain possession of the skinned river otter carcass (not the hide).**

312 IAC 9-10-12: Fur Buyer's License

The Division of Fish and Wildlife is requesting to correct the changes to subsection (e) for licensed fur buyers as the result of public comment. The intent of the proposed change was to require fur buyers to record the date and method of lawful acquisition for each hide or carcass that is purchased, and only to require documentation for bobcats and badgers since there is no open season for them in Indiana (there is in some other states). The rule would be revised as follows:

(e) A licensed fur buyer must do the following:

- (1) Not possess the carcass or untanned hide or any part of a bobcat, ~~river otter~~, or badger unless the carcass, untanned hide, or part was lawfully acquired outside Indiana.
- (2) Document **the date and method of** lawful acquisition of each untanned hide or carcass **of a bobcat and badger** by obtaining from the seller a legible copy of any:
 - (A) tag;
 - (B) receipt;
 - (C) hunting license;
 - (D) trapping license;
 - (E) permit; or
 - (F) other appropriate record;
 from the state or country where the animal, including any part or portion of the animal, was acquired.
- (3) **Record the date and method of lawful acquisition of each untanned hide or carcass of a wild animal other than a bobcat and badger.**

The Division of Fish and Wildlife is also proposing to delete subsection (i) requiring carcasses and other parts of wild animals taken in by licensed fur buyers to be disposed of in a certain manner. Few complaints have been received about the disposal of carcasses by licensed fur buyers, and the state law in IC 32-30-6 allows landowners to file a complaint in a civil court regarding a public nuisance on adjacent

land. Therefore, the Division of Fish and Wildlife does not believe that these changes are needed at this time.

EXHIBIT D

TITLE 312 NATURAL RESOURCES COMMISSION

Final Rule

LSA Document #14-341(F)

DIGEST

Amends 312 IAC 9-2-3 to allow the sale of squirrel hides and any portion of a river otter. Amends 312 IAC 9-3-18.2 to establish a trapping season for river otters. Amends 312 IAC 9-3-18.4 to remove the references to river otters. Amends 312 IAC 9-10-12 governing fur buyers' licenses. Effective 30 days after filing with the Publisher.

312 IAC 9-2-3; 312 IAC 9-3-18.2; 312 IAC 9-3-18.4; 312 IAC 9-10-12

SECTION 1. 312 IAC 9-2-3 IS AMENDED TO READ AS FOLLOWS:

312 IAC 9-2-3 Application of this article to wild animal parts

Authority: IC 14-22-2-6

Affected: IC 14-22

Sec. 3. (a) Except as provided in subsection (b), a prohibition against the:

- (1) possession;
- (2) sale;
- (3) offer for sale;
- (4) purchase;
- (5) offer for purchase;
- (6) shipment;
- (7) transportation;
- (8) delivery; or
- (9) receipt;

of a wild animal also applies to any part or portion of that wild animal.

(b) The prohibition established under subsection (a) does not apply to the following parts of wild animals taken lawfully:

- (1) Tanned hides.
- (2) Any portion of a ~~furbearer~~ **furbearing mammal**.
- (3) Cured feathers.
- (4) Squirrel tails.
- (5) Untanned deer hides.
- (6) Antlers.
- (7) Hooves.
- (8) Any portion of a river otter.**

(9) Untanned squirrel hides.

(Natural Resources Commission; 312 IAC 9-2-3; filed May 12, 1997, 10:00 a.m.: 20 IR 2700; filed May 28, 1998, 5:14 p.m.: 21 IR 3712; readopted filed Jul 28, 2003, 12:00 p.m.: 27 IR 286; readopted filed Nov 24, 2008, 11:08 a.m.: 20081210-IR-312080672RFA; filed Mar 12, 2010, 1:28 p.m.: 20100407-IR-312090479FRA; readopted filed May 20, 2014, 9:43 a.m.: 20140618-IR-312140017RFA)

SECTION 2. 312 IAC 9-3-18.2 IS AMENDED TO READ AS FOLLOWS:

312 IAC 9-3-18.2 River otters

Authority: IC 14-10-2-4; IC 14-22-2-6

Affected: IC 14-22

Sec. 18.2. (a) ~~A person must not take~~ **An individual may trap** a river otter (*Lutra canadensis*) ~~except with one (1) of the following:~~

~~(1) A scientific purposes license under 312 IAC 9-10-6.~~

~~(2) A nuisance wild animal control permit under 312 IAC 9-10-11.~~

from 8:00 a.m. on November 15 until noon on March 15 of the following year. An individual who sets a trap for a river otter must be at least ten (10) years old, unless the individual has passed a state-certified trapper education course.

(b) In order to trap a river otter, an individual must possess one (1) of the following valid Indiana trapping licenses or be exempt from needing a license as authorized in IC 14-22-11-1:

(1) Resident yearly trapping license under IC 14-22-12-1(a)(4).

(2) Nonresident yearly trapping license under IC 14-22-12-1(a)(7).

(3) Resident youth consolidated hunting, trapping, and fishing license under IC 14-22-12-1(a)(24) or IC 14-22-11-10(b).

(4) Nonresident youth yearly trapping license under IC 14-22-12-1(a)(26).

(5) Lifetime basic trapping license under IC 14-22-12-7(a)(6) before its repeal.

(c) An individual must not take more than two (2) river otters per season. An individual that sets the trap that caught the river otter must count the river otter toward his or her season limit.

(d) An individual that accidentally kills a river otter after the bag limit or statewide quota has been reached or during the closed season must notify the department within twenty-four (24) hours of capture and make arrangements to give that river otter to the department. An individual who traps a river otter alive and does not include it in that individual's bag limit must release the river otter into the wild in the location in which it was captured immediately upon discovery or notification that a river otter has been caught in the trap.

(e) An individual must not trap river otters except in a county the director designates on an annual basis by temporary rule.

(f) Annually, the director shall establish by temporary rule the statewide quota for river otters that may be taken during a season. The director may close the season established under subsection (a) by temporary rule upon a determination that the allowable harvest of river otters for the year has been reached.

(g) An individual who takes a river otter must report the take or cause the reporting of the take by providing the information required on the department's electronic harvest reporting system within twenty-four (24) hours of the taking of the river otter. The individual who reports the take on the department's electronic harvest reporting system must provide true and accurate information. The confirmation number provided by the electronic harvest reporting system must be maintained with the river otter until the river otter is checked in with a designated department employee or at an official river otter checking station.

(h) An individual who takes a river otter during the trapping season must retain possession of the river otter and cause delivery of the skinned hide and carcass, including the head, of the river otter to a designated department employee or official river otter checking station within fifteen (15) days after the month of harvest. The department employee must:

- (1) issue a tag and attach it to each hide in accordance with 50 CFR 23.69; and**
- (2) maintain possession of the skinned river otter carcass (not the hide).**

(i) A river otter, including the hide and any other part or portion, taken during the trapping season must not be:

- (1) sold;**
- (2) traded;**
- (3) bartered;**
- (4) gifted;**
- (5) transferred to a taxidermist or any other person; or**
- (6) shipped;**

until registered through the department's electronic registration system and issued a tag by a department employee in accordance with subsection (h).

(j) After registering the river otter and obtaining the tag from the department in accordance with this section, an individual who takes a river otter may:

- (1) sell;**
- (2) trade;**
- (3) barter;**
- (4) ship; or**
- (5) other transfer;**

a river otter in accordance with this section and 50 CFR 23.69.

(k) An individual may possess the untanned hide of a river otter as follows:

- (1) During the trapping season established in subsection (a).**

- (2) Until May 15 of the year the trapping season closed as established in subsection (a).
- (3) Until June 15 of the year the trapping season closed if the individual submits a report to the department by May 15 on a signed departmental form that lists the number of untanned river otter hides possessed and not sold to a licensed fur buyer.
- (4) With a valid fur buyer's license in compliance with IC 14-22-19 and 312 IAC 9-10-12.
- (5) With a valid taxidermy license in compliance with IC 14-22-21 and 312 IAC 9-10-5.
- (6) With a valid special purpose salvage permit in compliance with 312 IAC 9-10-13.5.
- (7) With a valid scientific purposes license in compliance with IC 14-22-22 and 312 IAC 9-10-6.

~~(b)~~ (l) An individual must not possess a live river otter except with one (1) of the following:

- (1) A wild animal rehabilitation permit under 312 IAC 9-10-9.
- (2) A scientific purposes license under 312 IAC 9-10-6.
- (3) A nuisance wild animal control permit under 312 IAC 9-10-11.
- (4) A registered or licensed educational or scientific institution with the United States Department of Agriculture in accordance with 9 CFR, Chapter 1, Subchapter A, Parts I through IV.
- (5) A breeder, dealer, or exhibitor license issued by the United States Department of Agriculture under 9 CFR, Chapter 1, Subchapter A, Parts I through IV.

~~(c)~~ (m) An individual must not sell a live river otter unless that person has a breeder, dealer, or exhibitor license issued by the United States Department of Agriculture under 9 CFR, Chapter 1, Subchapter A, Parts I through IV. *(Natural Resources Commission; 312 IAC 9-3-18.2; filed Jun 23, 2006, 2:24 p.m.: 20060719-IR-312050214FRA; readopted filed Nov 24, 2008, 11:08 a.m.: 20081210-IR-312080672RFA; filed Mar 12, 2010, 1:28 p.m.: 20100407-IR-312090479FRA; readopted filed May 20, 2014, 9:43 a.m.: 20140618-IR-312140017RFA)*

SECTION 3. 312 IAC 9-3-18.4 IS AMENDED TO READ AS FOLLOWS:

312 IAC 9-3-18.4 Possession and sale of bobcats and badgers

Authority: IC 14-22-2-6

Affected: IC 14-22

Sec. 18.4. (a) A person must not possess or sell a carcass, hide, or any part of a bobcat ~~river otter~~, or badger unless the person meets one (1) of the following requirements:

- (1) The person possesses satisfactory documentation that the carcass, hide, or part was lawfully acquired. Satisfactory documentation must include one (1) or more of the following:
 - (A) A legible copy of any of the following:
 - (i) A tag.
 - (ii) A receipt.

- (iii) A hunting license.
 - (iv) A trapping license.
 - (v) A permit.
 - (vi) Other appropriate record from the state or country where the animal, including any part or portion of the animal, was acquired.
- (B) A receipt from either of the following:
 - (i) A fur buyer licensed under 312 IAC 9-10-12.
 - (ii) A taxidermist licensed under 312 IAC 9-10-5.
- (2) The person obtains the:
 - (A) carcass;
 - (B) hide; or
 - (C) part;
 from the director or his designee with written permission.
- (b) In addition to subsection (a), a person must not possess a carcass or untanned hide of
 - ~~(1)~~ bobcat
 - ~~(2)~~ river otter; or
 - ~~(3)~~ badger
 for more than fourteen (14) days unless the person is a fur buyer licensed under 312 IAC 9-10-12.
- (c) A fur buyer licensed under 312 IAC 9-10-12, or a taxidermist licensed under 312 IAC 9-10-5, who sells:
 - (1) a carcass;
 - (2) a hide; or
 - (3) any part;
 of a bobcat ~~river otter~~, or badger must provide the purchaser with the documentation described in subsection (a). A purchaser who relies in good faith upon the documentation may offer it as an affirmative defense to an infraction or civil penalty alleging a violation of subsection (a). *(Natural Resources Commission; 312 IAC 9-3-18.4; filed Jun 23, 2006, 2:24 p.m.: 20060719-IR-312050214FRA; readopted filed Nov 24, 2008, 11:08 a.m.: 20081210-IR-312080672RFA; readopted filed May 20, 2014, 9:43 a.m.: 20140618-IR-312140017RFA)*

SECTION 4. 312 IAC 9-10-12 IS AMENDED TO READ AS FOLLOWS:

312 IAC 9-10-12 Fur buyers' licenses

Authority: IC 14-11-2-1; IC 14-22-2-6; IC 14-22-19

Affected: IC 14-22-19-3

Sec. 12. (a) This section applies to a person who is issued a fur buyer's license under IC 14-22-19-3.

(b) A fur buyer's license must be obtained under this section before a person engages in the business of buying furbearing mammals, **river otters, badgers, and bobcats** or the untanned hides, skins, or furs of furbearing mammals, **river otters, badgers, and bobcats** in Indiana.

(c) A person shall make application for a license under this section on a departmental form.

(d) Except as otherwise provided in this subsection, a licensed fur buyer may possess the carcasses and untanned hides of:

- (1) furbearing mammals;
- (2) river otters;**
- (3) badgers; and**
- (4) bobcats;**

that are lawfully taken ~~in season for not more than sixty (60) days after the last day of that season; and (2) bobcats, river otters, and badgers, for not more than sixty (60) days from receipt of the carcass or untanned hide.~~ **until June 30 of the year the license expires.**

(e) A licensed fur buyer must do the following:

- (1) Not possess the carcass or untanned hide or any part of a bobcat ~~river otter~~, or badger unless the carcass, untanned hide, or part was lawfully acquired outside Indiana.
- (2) Document **the date and method of** lawful acquisition of each untanned hide or carcass **of a bobcat and badger** by obtaining from the seller a legible copy of any:
 - (A) tag;
 - (B) receipt;
 - (C) hunting license;
 - (D) trapping license;
 - (E) permit; or
 - (F) other appropriate record;

from the state or country where the animal, including any part or portion of the animal, was acquired.

(3) Record the date and method of lawful acquisition of each untanned hide or carcass of a wild animal other than a bobcat and badger.

(f) ~~Notwithstanding subsection (b),~~ A licensed fur buyer may ~~as authorized by the division director,~~ possess a carcass or untanned hide ~~in excess of sixty (60) days after the:~~

- ~~(1) close of a season; or~~
- ~~(2) receipt of a carcass or untanned hide of a bobcat, river otter, or badger;~~

June 30 of the year the license expires upon the submission of a signed report to the department **by June 30** identifying the species, number, and location of furs or carcasses ~~are~~ kept.

(g) A licensed fur buyer must issue a valid, dated receipt for any wild animal that is sold, traded, bartered, or gifted. The receipt must include the following information:

- (1) The fur buyer's license number.
- (2) The buyer's and the seller's names and addresses.
- (3) The:
 - (A) number; and
 - (B) species;
 of animals sold.

(h) A conservation officer may, at any reasonable time, inspect the records, hides, and carcasses of wild animals possessed by a licensed fur buyer.

(Natural Resources Commission; 312 IAC 9-10-12; filed May 12, 1997, 10:00 a.m.: 20 IR 2732; readopted filed Jul 28, 2003, 12:00 p.m.: 27 IR 286; filed Jun 23, 2006, 2:24 p.m.: 20060719-IR-312050214FRA; readopted filed Nov 24, 2008, 11:08 a.m.: 20081210-IR-312080672RFA; filed Jul 6, 2010, 1:55 p.m.: 20100804-IR-312090616FRA; readopted filed May 20, 2014, 9:43 a.m.: 20140618-IR-312140017RFA)